

**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

VERTICAL AVIATION INTERNATIONAL,
INC.; AIRBORNE AVIATION, INC. d/b/a
MAGNUM HELICOPTERS; ALEXAIR,
INC. d/b/a MAVERICK HELICOPTERS;
ALOHA HELICOPTER TOURS LLC d/b/a
ALI'I AIR TOURS AND CHARTERS; ARIS,
INC d/b/a AIR MAUI HELICOPTER
TOURS; ARIS NEVADA, INC. d/b/a AIR
KAUAI HELICOPTER TOURS; HAWAII
PACIFIC AVIATION, INC. d/b/a MAUNA
LOA HELICOPTERS; ISLAND
HELICOPTERS KAUAI, INC.; JACK
HARTER HELICOPTERS, INC.;
NOVICTOR AVIATION LLC d/b/a
RAINBOW HELICOPTERS; AND SAFARI
AVIATION, INC. d/b/a SAFARI
HELICOPTERS,

Petitioners,

v.

FEDERAL AVIATION ADMINISTRATION,

Respondent.

Case Number 25-1110

PETITION FOR REVIEW

Pursuant to 49 U.S.C. § 46110, 5 U.S.C. § 706, and Fed. Rule App. Proc. 15, the Petitioners request the review of certain final orders of the Federal Aviation Administration (“FAA”) dated February 14, 2025 in which they have a substantial interest and by which will be adversely affected.

Background

On or about January 24, 2025, the air tour operators Airborne Aviation, Inc. d/b/a Magnum Helicopters; Alexair, Inc. d/b/a Maverick Helicopters; Aloha Helicopter Tours LLC d/b/a Ali'i Air Tours and Charters; Aris, Inc. d/b/a Air Maui Helicopter Tours; Aris Nevada, Inc. d/b/a Air Kauai Helicopter Tours; Hawaii Pacific Aviation, Inc. d/b/a Mauna Loa Helicopters; Island Helicopters Kauai, Inc.; Jack Harter Helicopters, Inc.; Novictor Aviation LLC d/b/a Rainbow Helicopters; and Safari Aviation, Inc. d/b/a Safari Helicopters – all of which are members of Vertical Aviation International, Inc. (collectively, “Petitioners”) – each submitted requests to the FAA proposing modifications to the FAA-approved manual implementing ¶ B048 of their FAA-issued Operations Specifications, which establish certain procedures for the operations of air tours in Hawaii.

Those requests were triggered by letters that each air tour operator had received from the FAA on November 20, 2024, proposing to archive the existing version of ¶ B048. Each of the operators separately and timely requested reconsideration of the November 20, 2024 letters on December 30, 2024. Those letters and requests are not directly at issue in this proceeding. But each operator by a letter to the FAA dated on or about January 24, 2025 also requested to modify the manuals implementing ¶ B048 that are at issue in this case, to address the

anticipated scenario in which their reconsideration requests were denied and the existing version of ¶ B048 archived by the FAA.¹

Petition for Review

On February 14, 2025, the FAA sent a letter to each of the Petitioners regarding the requested modifications to the manual implementing ¶ B048. To the extent that the FAA by archiving ¶ B048 would prohibit air tour operations in Hawaii below an altitude of 1500 feet above ground level (except in the event of unforecast weather) the February 14, 2025 letters specified that position was a final decision and would not be further considered by the FAA – *e.g.*, “ingress and egress altitudes below 1500' above the surface level are not acceptable.”

But, as discussed in the operators’ January 24, 2025 requests, the FAA previously allowed such operations in order to ensure safety, consistent with NTSB recommendations, and accordingly its new prohibition on such operations – including its final refusal on February 14, 2025 to re-enable them by manual modifications – is contrary to law and subject to review.

The November 20, 2024 FAA letters; the January 24, 2025 manual modification requests from the air tour operators; and the February 14, 2025 FAA letters are attached as Exhibits 1-3, respectively. Petitioners understand that the

¹ On March 3, 2025, the FAA denied the December 30, 2024 requests for reconsideration of its November 20, 2024 letters. On April 2, 2025, the Petitioners each requested further reconsideration within the FAA, which is pending.

letters and requests are substantively identical. This petition is timely, because it has been filed within 60 days of the final orders (*i.e.*, the February 14, 2025 FAA letters), as statutorily required.

Related Case

The case *Vertical Aviation International, Inc., et al. v. FAA*, D.C. Circuit No. 25-1017, is related to this case, because it constitutes a petition by substantially the same parties² to certain other FAA final orders – including FAA Advisory Circular 136-4 and associated FAA documents – which are the explicit or implicit basis for the proposed archiving of the current version of ¶ B048 and the FAA’s refusal in the final orders at issue in this case to continue to allow any Hawaii air tour operations below 1500’ above ground level.

² An additional petitioner in this case is Aris Nevada, Inc. d/b/a Air Kauai Helicopter Tours, a subsidiary of Aris, Inc. d/b/a Air Maui Helicopter Tours, which is a petitioner in both cases.

Respectfully submitted,

KMA ZUCKERT LLP



Dated: April 14, 2025

Jolyon ("Jol") A. Silversmith
D.C. Circuit Bar No. 46700
Barbara M. Marrin
D.C. Circuit Bar No. 60286
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Fax (202) 342-0683
jsilversmith@kmazuckert.com
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Nathan M. Wheat
D.C. Circuit Bar No. 65823
Murray, Morin & Herman, P.A.
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Tampa, FL 33618
(813) 222-1800
Fax (813) 222-1801
nwheat@mmhlaw.com

**IN THE UNITED STATES COURT OF APPEALS
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ALOHA HELICOPTER TOURS LLC d/b/a
ALI'I AIR TOURS AND CHARTERS; ARIS,
INC d/b/a AIR MAUI HELICOPTER
TOURS; ARIS NEVADA, INC. d/b/a AIR
KAUAI HELICOPTER TOURS; HAWAII
PACIFIC AVIATION, INC. d/b/a MAUNA
LOA HELICOPTERS; ISLAND
HELICOPTERS KAUAI, INC.; JACK
HARTER HELICOPTERS, INC.;
NOVICTOR AVIATION LLC d/b/a
RAINBOW HELICOPTERS; AND SAFARI
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FEDERAL AVIATION ADMINISTRATION,

Respondent.

Case Number 25-1110

CORPORATE DISCLOSURE STATEMENT

Pursuant to Fed. R. App. P. 26.1 and Circuit Rule 26.1:

Petitioner Vertical Aviation Association, Inc. states that it has no parent corporation, and that no publicly held corporation own 10% or more of its stock.

Vertical Aviation International is a trade association representing the vertical aviation industry.

Petitioner Airborne Aviation, Inc. d/b/a Magnum Helicopters states that it has no parent corporation, and that no publicly held corporation owns 10% or more of its stock. Magnum Helicopters operates helicopters for tourism and other missions in Hawaii.

Petitioner Alexair, Inc. d/b/a Maverick Helicopters states that its parent corporation is Maverick Airstar Holding Corporation LLC, and that no publicly held corporation owns 10% or more of its stock. Maverick Helicopters operates helicopters for tourism and other missions in Hawaii.

Petitioner Aloha Helicopter Tours LLC d/b/a Ali'i Air Tours and Charters states that its parent corporation is BEZ Corporation, and that no publicly held corporation owns 10% or more of its stock. Ai'i Air Tours and Charters operates helicopters for tourism and other missions in Hawaii.

Petitioner Aris, Inc. d/b/a Air Maui Helicopter Tours states that it has no parent corporation, and that no publicly held corporation owns 10% or more of its stock. Air Maui Helicopter Tours operates helicopters for tourism and other missions in Hawaii.

Petitioner Aris Nevada, Inc. d/b/a Air Kauai Helicopter Tours states that its parent corporation is Aris, Inc., and that no publicly held corporation owns 10% or

more of its stock. Air Kauai Helicopter Tours operates helicopters for tourism and other missions in Hawaii.

Petitioner Hawaii Pacific Aviation, Inc., d/b/a Mauna Loa Helicopters states that it has no parent corporation, and that no publicly held corporation owns 10% or more of its stock. Mauna Loa Helicopters operates helicopters for tourism and other missions in Hawaii.

Petitioner Island Helicopters Kauai, Inc. states that it has no parent corporation, and that no publicly held corporation owns 10% or more of its stock. Island Helicopters Kauai operates helicopters for tourism and other missions in Hawaii.

Petitioner Jack Harter Helicopters, Inc. states that it has no parent corporation, and that no publicly held corporation owns 10% or more of its stock. Jack Harter Helicopters operates helicopters for tourism and other missions in Hawaii.

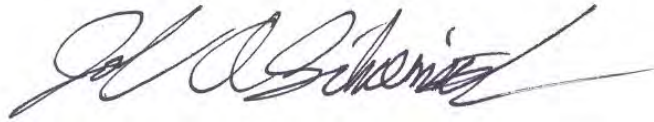
Petitioner Novictor Aviation LLC d/b/a Rainbow Helicopters states that it has no parent corporation, and that no publicly held corporation owns 10% or more of its stock. Rainbow Helicopters operates helicopters for tourism and other missions in Hawaii.

Petitioner Safari Aviation, Inc., d/b/a Safari Helicopters states that it has no parent corporation, and that no publicly held corporation owns 10% or more of its

stock. Safari Helicopters operates helicopters for tourism and other missions in Hawaii.

Respectfully submitted,

KMA ZUCKERT LLP



Dated: April 14, 2025

Jolyon (“Jol”) A. Silversmith
D.C. Circuit Bar No. 46700
Barbara M. Marrin
D.C. Circuit Bar No. 60286
888 17th Street, N.W., Suite 620
Washington, DC 20006
(202) 298-8660
Fax (202) 342-0683
jsilversmith@kmazuckert.com
bmarrin@kmazuckert.com

Nathan M. Wheat
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ALOHA HELICOPTER TOURS LLC d/b/a
ALI'I AIR TOURS AND CHARTERS; ARIS,
INC d/b/a AIR MAUI HELICOPTER
TOURS; ARIS NEVADA, INC. d/b/a AIR
KAUAI HELICOPTER TOURS; HAWAII
PACIFIC AVIATION, INC. d/b/a MAUNA
LOA HELICOPTERS; ISLAND
HELICOPTERS KAUAI, INC.; JACK
HARTER HELICOPTERS, INC.;
NOVICTOR AVIATION LLC d/b/a
RAINBOW HELICOPTERS; AND SAFARI
AVIATION, INC. d/b/a SAFARI
HELICOPTERS,

Petitioners,

v.

FEDERAL AVIATION ADMINISTRATION,

Respondent.

Case Number 25-1110

CERTIFICATE OF SERVICE

I certify that I today caused a true and accurate copy of the foregoing
Petition for Review, Corporate Disclosure Statement, and Circuit Rule 28(a)(1)
Statement to be served by first-class mail, postage prepaid, upon the following:

Liam McKenna, Chief Counsel
Federal Aviation Administration
800 Independence Avenue S.W.
Washington, DC 20591


Caroline Lopez
Courtney Dixon
Michael Raab
Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, DC 20530

Chris Rocheleau, Acting Administrator
Federal Aviation Administration
800 Independence Avenue S.W.
Washington, DC 20591

Courtesy copies also have been sent by electronic mail to
liam.mckenna@faa.gov, caroline.d.lopez@usdoj.gov, courtney.l.dixon@usdoj.gov,
michael.raab@usdoj.gov, civilappellate.ecf@usdoj.gov, and
chris.rocheleau@faa.gov.

Respectfully submitted,

KMA ZUCKERT LLP



Dated: April 14, 2025

Jolyon ("Jol") A. Silversmith
D.C. Circuit Bar No. 46700
Barbara M. Marrin
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Nathan M. Wheat
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3550 Buschwood Park Drive, Suite 130
Tampa, FL 33618
(813) 222-1800
Fax (813) 222-1801
nwheat@mmhlaw.com

Exhibit 1



U.S. Department
of Transportation
**Federal Aviation
Administration**

Aviation Safety
Honolulu Combined Safety Assurance Office
Flight Standards District Office

135 Nakolo Place
Honolulu, HI 96819-1845
(O) 808-837-8300
(F) 808-837-8399
(E) 7-AWP-HNL-FSDO@FAA.GOV

November 20, 2024

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Douglas Froning
Director of Operations
Airborne Aviation, Inc.
PO Box 71
Lihue, Hawaii 96766
doug@airborneaviationhawaii.com

Dear Mr. Froning:

This is to notify you that in accordance with Title 14 Code of Federal Regulations (CFR) § 119.51(a)(1), § 119.51(b)(1), and § 136.3, the Federal Aviation Administration (FAA) hereby proposes to amend the Operations Specifications (OpSpecs) and Letter of Authorization (as applicable) for Airborne Aviation Inc. (3M3A). This change to the OpSpecs and LOA affects OpSpec paragraph B048 and LOA B548. The FAA proposes to archive the current and all previous revisions of OpSpecs B048 and LOA B548 unless you submit written information, views, and arguments in response to this proposed amendment.

The above-mentioned proposal is a result of the FAA decision to replace the manner in which commercial air tour operators in the state of Hawaii are able to obtain deviation authority thru the OpSpecs B048 and Letter of Authorization (LOA) B548, for, Commercial Air Tour Operations Below 1,500 Feet Above the Surface in the State of Hawaii.

The FAA's decision was made after a thorough review and analysis of the commercial air tour operations accident historical data and National Transportation Safety Board (NTSB) safety recommendations. The FAA also considered the current deviation authorization provisions, conditions, and limitations set forth in OpSpec B048 and LOA B548.

Advisory Circular 136-4 Supplemental Information for the Creation of Operating Procedures and Pilot Training Subjects Related to OpSpec/LOA B048, provides operators with information on how to develop certificate holder or operator specific operating procedures and pilot training subjects and receive approval for the amended deviation authority.

Consistent with 14 CFR § 119.51(b)(2), you have until December 31st, 2024, to submit written information, views, and arguments on the proposed amendment to this office at 7-AWP-HNL-FSDO@faa.gov.

The FAA will consider any material you present, and in accordance with 14 CFR § 119.51(b)(3), will notify you of the adoption, partial adoption, or withdrawal of the proposed amendment.

If this office notifies you of the adoption or partial adoption of the amendment to your OpSpecs or LOA, the adoption or partial adoption will become effective not less than 30 days after your receipt of that notice unless you petition for reconsideration under 14 CFR § 119.51(d).

A petition for reconsideration must be addressed to the Executive Director, Flight Standards Service, and must be filed within 30 days of the date you receive notice of the adoption or partial adoption of the amendment.

Absent any reconsideration or approved packet submitted sooner, OpSpec B048 and LOA B548 will be archived on May 11, 2025. The Hawaii Air Tours Common Procedures Manual will also archive on May 11, 2025.

Please contact the Honolulu Flight Standards District Office at 7-AWP-HNL-FSDO@faa.gov for answers to any questions relating to this notification.

Sincerely,

Merritte H. Wilson
Manager (A)
Honolulu Combined Safety Assurance Office – FSDO, AWP-13



U.S. Department
of Transportation
**Federal Aviation
Administration**

Aviation Safety
Honolulu Combined Safety Assurance Office
Flight Standards District Office

135 Nakolo Place
Honolulu, HI 96819-1845
(O) 808-837-8300
(F) 808-837-8399
(E) 7-AWP-HNL-FSDO@FAA.GOV

November 20, 2024

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Brent Armenta
Director of Operations
Alexair Inc.
1 Kahului Airport Rd
Hangar 108
Kahului, Hawaii 96732
barmenta@flymaverick.com

Dear Mr. Armenta:

This is to notify you that in accordance with Title 14 Code of Federal Regulations (CFR) § 119.51(a)(1), § 119.51(b)(1), and § 136.3, the Federal Aviation Administration (FAA) hereby proposes to amend the Operations Specifications (OpSpecs) and Letter of Authorization (as applicable) for Alexair, Inc. (X33A). This change to the OpSpecs and LOA affects OpSpec paragraph B048 and LOA B548. The FAA proposes to archive the current and all previous revisions of OpSpecs B048 and LOA B548 unless you submit written information, views, and arguments in response to this proposed amendment.

The above-mentioned proposal is a result of the FAA decision to replace the manner in which commercial air tour operators in the state of Hawaii are able to obtain deviation authority thru the OpSpecs B048 and Letter of Authorization (LOA) B548, for, Commercial Air Tour Operations Below 1,500 Feet Above the Surface in the State of Hawaii.

The FAA's decision was made after a thorough review and analysis of the commercial air tour operations accident historical data and National Transportation Safety Board (NTSB) safety recommendations. The FAA also considered the current deviation authorization provisions, conditions, and limitations set forth in OpSpec B048 and LOA B548.

Advisory Circular 136-4 Supplemental Information for the Creation of Operating Procedures and Pilot Training Subjects Related to OpSpec/LOA B048, provides operators with information on how to develop certificate holder or operator specific operating procedures and pilot training subjects and receive approval for the amended deviation authority.

Consistent with 14 CFR § 119.51(b)(2), you have until December 31st, 2024, to submit written information, views, and arguments on the proposed amendment to this office at 7-AWP-HNL-FSDO@faa.gov.

The FAA will consider any material you present, and in accordance with 14 CFR § 119.51(b)(3), will notify you of the adoption, partial adoption, or withdrawal of the proposed amendment.

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Absent any reconsideration or approved packet submitted sooner, OpSpec B048 and LOA B548 will be archived on May 11, 2025. The Hawaii Air Tours Common Procedures Manual will also archive on May 11, 2025.

Please contact the Honolulu Flight Standards District Office at 7-AWP-HNL-FSDO@faa.gov for answers to any questions relating to this notification.

Sincerely,

MERRITTE H WILSON
III
Digitally signed
by MERRITTE H
WILSON III
Date: 2024.11.21
06:08:43 -10'00'

Merritte H. Wilson
Manager (A)
Honolulu Combined Safety Assurance Office – FSDO, AWP-13



U.S. Department
of Transportation
**Federal Aviation
Administration**

Aviation Safety
Honolulu Combined Safety Assurance Office
Flight Standards District Office

135 Nakolo Place
Honolulu, HI 96819-1845
(O) 808-837-8300
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(E) 7-AWP-HNL-FSDO@FAA.GOV

November 20, 2024

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. William Zeffiro
Responsible Person Business Management
Aloha Helicopter Tours
2798 Upena Street
Lihue, Hawaii 96766
alohahelitours@gmail.com

Dear Mr. Zeffiro:

This is to notify you that in accordance with Title 14 Code of Federal Regulations (CFR) § 119.51(a)(1), § 119.51(b)(1), and § 136.3, the Federal Aviation Administration (FAA) hereby proposes to amend the Operations Specifications (OpSpecs) and Letter of Authorization (as applicable) for Aloha Helicopter Tours (WZPJ). This change to the OpSpecs and LOA affects OpSpec paragraph B048 and LOA B548. The FAA proposes to archive the current and all previous revisions of OpSpecs B048 and LOA B548 unless you submit written information, views, and arguments in response to this proposed amendment.

The above-mentioned proposal is a result of the FAA decision to replace the manner in which commercial air tour operators in the state of Hawaii are able to obtain deviation authority thru the OpSpecs B048 and Letter of Authorization (LOA) B548, for, Commercial Air Tour Operations Below 1,500 Feet Above the Surface in the State of Hawaii.

The FAA's decision was made after a thorough review and analysis of the commercial air tour operations accident historical data and National Transportation Safety Board (NTSB) safety recommendations. The FAA also considered the current deviation authorization provisions, conditions, and limitations set forth in OpSpec B048 and LOA B548.

Advisory Circular 136-4 Supplemental Information for the Creation of Operating Procedures and Pilot Training Subjects Related to OpSpec/LOA B048, provides operators with information on how to develop certificate holder or operator specific operating procedures and pilot training subjects and receive approval for the amended deviation authority.

Consistent with 14 CFR § 119.51(b)(2), you have until December 31st, 2024, to submit written information, views, and arguments on the proposed amendment to this office at 7-AWP-HNL-FSDO@faa.gov.

The FAA will consider any material you present, and in accordance with 14 CFR § 119.51(b)(3), will notify you of the adoption, partial adoption, or withdrawal of the proposed amendment.

If this office notifies you of the adoption or partial adoption of the amendment to your OpSpecs or LOA, the adoption or partial adoption will become effective not less than 30 days after your receipt of that notice unless you petition for reconsideration under 14 CFR § 119.51(d).

A petition for reconsideration must be addressed to the Executive Director, Flight Standards Service, and must be filed within 30 days of the date you receive notice of the adoption or partial adoption of the amendment.

Absent any reconsideration or approved packet submitted sooner, OpSpec B048 and LOA B548 will be archived on May 11, 2025. The Hawaii Air Tours Common Procedures Manual will also archive on May 11, 2025.

Please contact the Honolulu Flight Standards District Office at 7-AWP-HNL-FSDO@faa.gov for answers to any questions relating to this notification.

Sincerely,

Merritte H. Wilson
Manager (A)
Honolulu Combined Safety Assurance Office – FSDO, AWP-13



U.S. Department
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**Federal Aviation
Administration**

Aviation Safety
Honolulu Combined Safety Assurance Office
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November 20, 2024

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Richard Olsten
Director of Operations
Aris, Inc.
P.O. Box 1539
Makawao, Hawaii 96768
richie@airmaui.com

Dear Mr. Olsten:

This is to notify you that in accordance with Title 14 Code of Federal Regulations (CFR) § 119.51(a)(1), § 119.51(b)(1), and § 136.3, the Federal Aviation Administration (FAA) hereby proposes to amend the Operations Specifications (OpSpecs) and Letter of Authorization (as applicable) for Aris, Inc. (MH9A). This change to the OpSpecs and LOA affects OpSpec paragraph B048 and LOA B548. The FAA proposes to archive the current and all previous revisions of OpSpecs B048 and LOA B548 unless you submit written information, views, and arguments in response to this proposed amendment.

The above-mentioned proposal is a result of the FAA decision to replace the manner in which commercial air tour operators in the state of Hawaii are able to obtain deviation authority thru the OpSpecs B048 and Letter of Authorization (LOA) B548, for, Commercial Air Tour Operations Below 1,500 Feet Above the Surface in the State of Hawaii.

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Please contact the Honolulu Flight Standards District Office at 7-AWP-HNL-FSDO@faa.gov for answers to any questions relating to this notification.

Sincerely,

Merritte H. Wilson
Manager (A)
Honolulu Combined Safety Assurance Office – FSDO, AWP-13



U.S. Department
of Transportation
**Federal Aviation
Administration**

Aviation Safety
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November 20, 2024

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Kelby Alexander
Agent for Service
Aris Nevada, Inc.
3711 Ahukini Road
Lihue, Hawaii 96766
kelby@airkauaihelicopters.com

Dear Mr. Alexander:

This is to notify you that in accordance with Title 14 Code of Federal Regulations (CFR) § 119.51(a)(1), § 119.51(b)(1), and § 136.3, the Federal Aviation Administration (FAA) hereby proposes to amend the Operations Specifications (OpSpecs) and Letter of Authorization (as applicable) for Aris Nevada, Inc. (9L1A). This change to the OpSpecs and LOA affects OpSpec paragraph B048 and LOA B548. The FAA proposes to archive the current and all previous revisions of OpSpecs B048 and LOA B548 unless you submit written information, views, and arguments in response to this proposed amendment.

The above-mentioned proposal is a result of the FAA decision to replace the manner in which commercial air tour operators in the state of Hawaii are able to obtain deviation authority thru the OpSpecs B048 and Letter of Authorization (LOA) B548, for, Commercial Air Tour Operations Below 1,500 Feet Above the Surface in the State of Hawaii.

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Consistent with 14 CFR § 119.51(b)(2), you have until December 31st, 2024, to submit written information, views, and arguments on the proposed amendment to this office at 7-AWP-HNL-FSDO@faa.gov.

The FAA will consider any material you present, and in accordance with 14 CFR § 119.51(b)(3), will notify you of the adoption, partial adoption, or withdrawal of the proposed amendment.

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Please contact the Honolulu Flight Standards District Office at 7-AWP-HNL-FSDO@faa.gov for answers to any questions relating to this notification.

Sincerely,

Merritte H. Wilson
Manager (A)
Honolulu Combined Safety Assurance Office – FSDO, AWP-13



U.S. Department
of Transportation
**Federal Aviation
Administration**

Aviation Safety
Honolulu Combined Safety Assurance Office
Flight Standards District Office

135 Nakolo Place
Honolulu, HI 96819-1845
(O) 808-837-8300
(F) 808-837-8399
(E) 7-AWP-HNL-FSDO@FAA.GOV

November 20, 2024

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Kalaei Gregory
Director of Operations
Hawaii Pacific Aviation
73-310 U'u Street
Kailua-Kona, Hawaii 96740
kalei@maunaloahelicopters.edu

Dear Mr. Gregory:

This is to notify you that in accordance with Title 14 Code of Federal Regulations (CFR) § 119.51(a)(1), § 119.51(b)(1), and § 136.3, the Federal Aviation Administration (FAA) hereby proposes to amend the Operations Specifications (OpSpecs) and Letter of Authorization (as applicable) for Hawaii Pacific Aviation (1MNA). This change to the OpSpecs and LOA affects OpSpec paragraph B048 and LOA B548. The FAA proposes to archive the current and all previous revisions of OpSpecs B048 and LOA B548 unless you submit written information, views, and arguments in response to this proposed amendment.

The above-mentioned proposal is a result of the FAA decision to replace the manner in which commercial air tour operators in the state of Hawaii are able to obtain deviation authority thru the OpSpecs B048 and Letter of Authorization (LOA) B548, for, Commercial Air Tour Operations Below 1,500 Feet Above the Surface in the State of Hawaii.

The FAA's decision was made after a thorough review and analysis of the commercial air tour operations accident historical data and National Transportation Safety Board (NTSB) safety recommendations. The FAA also considered the current deviation authorization provisions, conditions, and limitations set forth in OpSpec B048 and LOA B548.

Advisory Circular 136-4 Supplemental Information for the Creation of Operating Procedures and Pilot Training Subjects Related to OpSpec/LOA B048, provides operators with information on how to develop certificate holder or operator specific operating procedures and pilot training subjects and receive approval for the amended deviation authority.

Consistent with 14 CFR § 119.51(b)(2), you have until December 31st, 2024, to submit written information, views, and arguments on the proposed amendment to this office at 7-AWP-HNL-FSDO@faa.gov.

The FAA will consider any material you present, and in accordance with 14 CFR § 119.51(b)(3), will notify you of the adoption, partial adoption, or withdrawal of the proposed amendment.

If this office notifies you of the adoption or partial adoption of the amendment to your OpSpecs or LOA, the adoption or partial adoption will become effective not less than 30 days after your receipt of that notice unless you petition for reconsideration under 14 CFR § 119.51(d).

A petition for reconsideration must be addressed to the Executive Director, Flight Standards Service, and must be filed within 30 days of the date you receive notice of the adoption or partial adoption of the amendment.

Absent any reconsideration or approved packet submitted sooner, OpSpec B048 and LOA B548 will be archived on May 11, 2025. The Hawaii Air Tours Common Procedures Manual will also archive on May 11, 2025.

Please contact the Honolulu Flight Standards District Office at 7-AWP-HNL-FSDO@faa.gov for answers to any questions relating to this notification.

Sincerely,

Merritte H. Wilson
Manager (A)
Honolulu Combined Safety Assurance Office – FSDO, AWP-13



U.S. Department
of Transportation
**Federal Aviation
Administration**

Aviation Safety
Honolulu Combined Safety Assurance Office
Flight Standards District Office

135 Nakolo Place
Honolulu, HI 96819-1845
(O) 808-837-8300
(F) 808-837-8399
(E) 7-AWP-HNL-FSDO@FAA.GOV

November 20, 2024

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Bernard Brodigan
Director of Operations
Island Helicopters Kauai, Inc.
PO Box 831
Lihue, Hawaii 96766
brodi@islandhelicopters.com

Dear Mr. Brodigan;

This is to notify you that in accordance with Title 14 Code of Federal Regulations (CFR) § 119.51(a)(1), § 119.51(b)(1), and § 136.3, the Federal Aviation Administration (FAA) hereby proposes to amend the Operations Specifications (OpSpecs) and Letter of Authorization (as applicable) for Island Helicopters Kauai, Inc. (ILDA). This change to the OpSpecs and LOA affects OpSpec paragraph B048 and LOA B548. The FAA proposes to archive the current and all previous revisions of OpSpecs B048 and LOA B548 unless you submit written information, views, and arguments in response to this proposed amendment.

The above-mentioned proposal is a result of the FAA decision to replace the manner in which commercial air tour operators in the state of Hawaii are able to obtain deviation authority thru the OpSpecs B048 and Letter of Authorization (LOA) B548, for, Commercial Air Tour Operations Below 1,500 Feet Above the Surface in the State of Hawaii.

The FAA's decision was made after a thorough review and analysis of the commercial air tour operations accident historical data and National Transportation Safety Board (NTSB) safety recommendations. The FAA also considered the current deviation authorization provisions, conditions, and limitations set forth in OpSpec B048 and LOA B548.

Advisory Circular 136-4 Supplemental Information for the Creation of Operating Procedures and Pilot Training Subjects Related to OpSpec/LOA B048, provides operators with information on how to develop certificate holder or operator specific operating procedures and pilot training subjects and receive approval for the amended deviation authority.

Consistent with 14 CFR § 119.51(b)(2), you have until December 31st, 2024, to submit written information, views, and arguments on the proposed amendment to this office at 7-AWP-HNL-FSDO@faa.gov.

The FAA will consider any material you present, and in accordance with 14 CFR § 119.51(b)(3), will notify you of the adoption, partial adoption, or withdrawal of the proposed amendment.

If this office notifies you of the adoption or partial adoption of the amendment to your OpSpecs or LOA, the adoption or partial adoption will become effective not less than 30 days after your receipt of that notice unless you petition for reconsideration under 14 CFR § 119.51(d).

A petition for reconsideration must be addressed to the Executive Director, Flight Standards Service, and must be filed within 30 days of the date you receive notice of the adoption or partial adoption of the amendment.

Absent any reconsideration or approved packet submitted sooner, OpSpec B048 and LOA B548 will be archived on May 11, 2025. The Hawaii Air Tours Common Procedures Manual will also archive on May 11, 2025.

Please contact the Honolulu Flight Standards District Office at 7-AWP-HNL-FSDO@faa.gov for answers to any questions relating to this notification.

Sincerely,

Merritte H. Wilson
Manager (A)
Honolulu Combined Safety Assurance Office – FSDO, AWP-13



U.S. Department
of Transportation
**Federal Aviation
Administration**

Aviation Safety
Honolulu Combined Safety Assurance Office
Flight Standards District Office

135 Nakolo Place
Honolulu, HI 96819-1845
(O) 808-837-8300
(F) 808-837-8399
(E) 7-AWP-HNL-FSDO@FAA.GOV

November 20, 2024

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Jason Darr
Director of Operations
Jack Harter Helicopters, Inc.
4231 Ahukini Road
Lihue, Hawaii 96766
jdarr@jackharterheli.com

Dear Mr. Darr:

This is to notify you that in accordance with Title 14 Code of Federal Regulations (CFR) § 119.51(a)(1), § 119.51(b)(1), and § 136.3, the Federal Aviation Administration (FAA) hereby proposes to amend the Operations Specifications (OpSpecs) and Letter of Authorization (as applicable) for Jack Harter Helicopters, Inc. (DCGA). This change to the OpSpecs and LOA affects OpSpec paragraph B048 and LOA B548. The FAA proposes to archive the current and all previous revisions of OpSpecs B048 and LOA B548 unless you submit written information, views, and arguments in response to this proposed amendment.

The above-mentioned proposal is a result of the FAA decision to replace the manner in which commercial air tour operators in the state of Hawaii are able to obtain deviation authority thru the OpSpecs B048 and Letter of Authorization (LOA) B548, for, Commercial Air Tour Operations Below 1,500 Feet Above the Surface in the State of Hawaii.

The FAA's decision was made after a thorough review and analysis of the commercial air tour operations accident historical data and National Transportation Safety Board (NTSB) safety recommendations. The FAA also considered the current deviation authorization provisions, conditions, and limitations set forth in OpSpec B048 and LOA B548.

Advisory Circular 136-4 Supplemental Information for the Creation of Operating Procedures and Pilot Training Subjects Related to OpSpec/LOA B048, provides operators with information on how to develop certificate holder or operator specific operating procedures and pilot training subjects and receive approval for the amended deviation authority.

Consistent with 14 CFR § 119.51(b)(2), you have until December 31st, 2024, to submit written information, views, and arguments on the proposed amendment to this office at 7-AWP-HNL-FSDO@faa.gov.

The FAA will consider any material you present, and in accordance with 14 CFR § 119.51(b)(3), will notify you of the adoption, partial adoption, or withdrawal of the proposed amendment.

If this office notifies you of the adoption or partial adoption of the amendment to your OpSpecs or LOA, the adoption or partial adoption will become effective not less than 30 days after your receipt of that notice unless you petition for reconsideration under 14 CFR § 119.51(d).

A petition for reconsideration must be addressed to the Executive Director, Flight Standards Service, and must be filed within 30 days of the date you receive notice of the adoption or partial adoption of the amendment.

Absent any reconsideration or approved packet submitted sooner, OpSpec B048 and LOA B548 will be archived on May 11, 2025. The Hawaii Air Tours Common Procedures Manual will also archive on May 11, 2025.

Please contact the Honolulu Flight Standards District Office at 7-AWP-HNL-FSDO@faa.gov for answers to any questions relating to this notification.

Sincerely,

MERRITTE
H WILSON
III

Digitally signed
by MERRITTE H
WILSON III
Date: 2024.11.21
05:53:34 -10'00'

Merritte H. Wilson
Manager (A)
Honolulu Combined Safety Assurance Office – FSDO, AWP-13



U.S. Department
of Transportation
**Federal Aviation
Administration**

Aviation Safety
Honolulu Combined Safety Assurance Office
Flight Standards District Office

135 Nakolo Place
Honolulu, HI 96819-1845
(O) 808-837-8300
(F) 808-837-8399
(E) 7-AWP-HNL-FSDO@FAA.GOV

November 20, 2024

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Ms. Nicole Battjes
Director of Operations
Novictor Aviation LLC
155 Kapalulu Place
Suite 197
Honolulu, Hawaii 96819

Dear Ms. Battjes:

This is to notify you that in accordance with Title 14 Code of Federal Regulations (CFR) § 119.51(a)(1), § 119.51(b)(1), and § 136.3, the Federal Aviation Administration (FAA) hereby proposes to amend the Operations Specifications (OpSpecs) and Letter of Authorization (as applicable) for Novictor Aviation LLC (2NVA). This change to the OpSpecs and LOA affects OpSpec paragraph B048 and LOA B548. The FAA proposes to archive the current and all previous revisions of OpSpecs B048 and LOA B548 unless you submit written information, views, and arguments in response to this proposed amendment.

The above-mentioned proposal is a result of the FAA decision to replace the manner in which commercial air tour operators in the state of Hawaii are able to obtain deviation authority thru the OpSpecs B048 and Letter of Authorization (LOA) B548, for, Commercial Air Tour Operations Below 1,500 Feet Above the Surface in the State of Hawaii.

The FAA's decision was made after a thorough review and analysis of the commercial air tour operations accident historical data and National Transportation Safety Board (NTSB) safety recommendations. The FAA also considered the current deviation authorization provisions, conditions, and limitations set forth in OpSpec B048 and LOA B548.

Advisory Circular 136-4 Supplemental Information for the Creation of Operating Procedures and Pilot Training Subjects Related to OpSpec/LOA B048, provides operators with information on how to develop certificate holder or operator specific operating procedures and pilot training subjects and receive approval for the amended deviation authority.

Consistent with 14 CFR § 119.51(b)(2), you have until December 31st, 2024, to submit written information, views, and arguments on the proposed amendment to this office at 7-AWP-HNL-FSDO@faa.gov.

The FAA will consider any material you present, and in accordance with 14 CFR § 119.51(b)(3), will notify you of the adoption, partial adoption, or withdrawal of the proposed amendment.

If this office notifies you of the adoption or partial adoption of the amendment to your OpSpecs or LOA, the adoption or partial adoption will become effective not less than 30 days after your receipt of that notice unless you petition for reconsideration under 14 CFR § 119.51(d).

A petition for reconsideration must be addressed to the Executive Director, Flight Standards Service, and must be filed within 30 days of the date you receive notice of the adoption or partial adoption of the amendment.

Absent any reconsideration or approved packet submitted sooner, OpSpec B048 and LOA B548 will be archived on May 11, 2025. The Hawaii Air Tours Common Procedures Manual will also archive on May 11, 2025.

Please contact the Honolulu Flight Standards District Office at 7-AWP-HNL-FSDO@faa.gov for answers to any questions relating to this notification.

Sincerely,

Merritte H. Wilson
Manager (A)
Honolulu Combined Safety Assurance Office – FSDO, AWP-13



U.S. Department
of Transportation
**Federal Aviation
Administration**

Aviation Safety
Honolulu Combined Safety Assurance Office
Flight Standards District Office

135 Nakolo Place
Honolulu, HI 96819-1845
(O) 808-837-8300
(F) 808-837-8399
(E) 7-AWP-HNL-FSDO@FAA.GOV

November 20, 2024

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Jason Murphy
Director of Operations
Safari Aviation, Inc.
PO Box 1941
Lihue, Hawaii 96766
murphy@safarihelicopters.com

Dear Mr. Murphy:

This is to notify you that in accordance with Title 14 Code of Federal Regulations (CFR) § 119.51(a)(1), § 119.51(b)(1), and § 136.3, the Federal Aviation Administration (FAA) hereby proposes to amend the Operations Specifications (OpSpecs) and Letter of Authorization (as applicable) for Safari Aviation, Inc. (XSFA). This change to the OpSpecs and LOA affects OpSpec paragraph B048 and LOA B548. The FAA proposes to archive the current and all previous revisions of OpSpecs B048 and LOA B548 unless you submit written information, views, and arguments in response to this proposed amendment.

The above-mentioned proposal is a result of the FAA decision to replace the manner in which commercial air tour operators in the state of Hawaii are able to obtain deviation authority thru the OpSpecs B048 and Letter of Authorization (LOA) B548, for, Commercial Air Tour Operations Below 1,500 Feet Above the Surface in the State of Hawaii.

The FAA's decision was made after a thorough review and analysis of the commercial air tour operations accident historical data and National Transportation Safety Board (NTSB) safety recommendations. The FAA also considered the current deviation authorization provisions, conditions, and limitations set forth in OpSpec B048 and LOA B548.

Advisory Circular 136-4 Supplemental Information for the Creation of Operating Procedures and Pilot Training Subjects Related to OpSpec/LOA B048, provides operators with information on how to develop certificate holder or operator specific operating procedures and pilot training subjects and receive approval for the amended deviation authority.

Consistent with 14 CFR § 119.51(b)(2), you have until December 31st, 2024, to submit written information, views, and arguments on the proposed amendment to this office at 7-AWP-HNL-FSDO@faa.gov.

The FAA will consider any material you present, and in accordance with 14 CFR § 119.51(b)(3), will notify you of the adoption, partial adoption, or withdrawal of the proposed amendment.

If this office notifies you of the adoption or partial adoption of the amendment to your OpSpecs or LOA, the adoption or partial adoption will become effective not less than 30 days after your receipt of that notice unless you petition for reconsideration under 14 CFR § 119.51(d).

A petition for reconsideration must be addressed to the Executive Director, Flight Standards Service, and must be filed within 30 days of the date you receive notice of the adoption or partial adoption of the amendment.

Absent any reconsideration or approved packet submitted sooner, OpSpec B048 and LOA B548 will be archived on May 11, 2025. The Hawaii Air Tours Common Procedures Manual will also archive on May 11, 2025.

Please contact the Honolulu Flight Standards District Office at 7-AWP-HNL-FSDO@faa.gov for answers to any questions relating to this notification.

Sincerely,

Merritte H. Wilson
Manager (A)
Honolulu Combined Safety Assurance Office – FSDO, AWP-13

Exhibit 2

January 24th, 2025

VIA EMAIL TO 7-AWP-HNL-FSDO@faa.gov

U.S. Department of Transportation
Federal Aviation Administration
Honolulu Flight Standards District Office
Seth Cossel
135 Nakolo Place
Honolulu, HI 96819-1845

Re: Airborne Aviation Inc.
Submission of proposed Hawaii Tour Operator B048 Manual

Dear Inspector Cossel:

This letter serves as a formal request for FAA approval of the new paragraph B048 of Operator's Operations Specifications (OpSpecs), in accordance with the enclosed Hawaii Tour Operator Manual, Revision 1, dated January 21, 2025 (the "Proposed Manual"), for continued use by Airborne Aviation. A copy of the Proposed Manual is submitted with this letter.

Please note that the Proposed Manual is being submitted to the FAA **under protest, and on a provisional basis**. More specifically, on November 20, 2024, the FAA issued a Notice to Airborne Aviation (the "Notice") in which the FAA proposed to archive Airborne Aviation's existing OpSpecs paragraph B048. The Notice appears to rely on the FAA's issuance of Advisory Circular 136-4 ("AC 136-4"). Airborne Aviation has responded to the Notice in detail, explaining why the FAA should not archive the existing B048. Airborne Aviation continues to object to the FAA's attempts to archive its existing B048, and further objects to any attempts by the FAA to rely upon or utilize AC 136-4 to modify or limit Airborne Aviation's current operating authority as set forth in its existing manuals, including but not limited to the existing B048.

As evidenced by the Notice, AC 136-4, and other issuances by the FAA (including Notice N8900.718, and Change 943 to FAA Order 8900.1, vol. 3, chap. 18, § 3-816), it is clear that the FAA intends to subject Airborne Aviation and other Hawaii air tour operators to new restrictions, relying at least in part upon the provisions of AC 136-4, beginning no later than May 11, 2025. This expedited transition threatens aviation safety. In an abundance of caution, and in the interest of the safety of its passengers, Airborne Aviation has no choice but to submit the Proposed Manual, solely as a stopgap measure while Airborne Aviation's challenges to the FAA's recent actions move forward.

Airborne Aviation desires to continue to operate in accordance with its existing B048 which the FAA has now proposed to archive. Thus, in the event the FAA withdraws its proposed archiving of Airborne Aviation's existing B048, then the FAA should consider this submission of the Proposed Manual to be withdrawn. Likewise, even if the Proposed Manual is approved, Operator's challenges to the FAA's recent actions will continue to move forward; but in the event Airborne Aviation is ultimately successful in challenging the FAA's actions in archiving B048

and/or the issuance of AC 136-4 and related orders/notices, then the Airborne Aviation intends to continue to operate under its existing B048 and the submission of this Proposed Manual should be considered withdrawn. Nothing in this conditional submission, made under protest, shall constitute a waiver of any rights, remedies, or claims of Airborne Aviation, including but not limited to those with respect to its existing B048, the proposed archiving, AC 136-4, and/or related notices/orders.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Delzelle Miranda", written in a cursive style.

Delzelle Miranda
President

Enclosure:

Hawaii Tour Operator Manual, Rev. 1



January 24, 2025

VIA EMAIL TO 7-AWP-HNL-FSDO@faa.gov

U.S. Department of Transportation
Federal Aviation Administration
Honolulu Flight Standards District Office
Seth Cossel
Principal Operations Inspector
135 Nakolo Place
Honolulu, HI 96819-1845

Re: Alex Air Inc. dba. Maverick Helicopters
Certificate No. X33A951N
Submission of proposed Hawaii Tour Alex Air Inc. B048 Manual

Dear Mr. Cossel:

This letter serves as a formal request for FAA approval of the new paragraph B048 of Alex Air Inc.'s Operations Specifications (OpSpecs), in accordance with the enclosed Hawaii Tour Alex Air Inc. Manual, Revision 1, dated January 21, 2025 (the "Proposed Manual"), for continued use by Alex Air Inc.. A copy of the Proposed Manual is submitted with this letter.

Please note that the Proposed Manual is being submitted to the FAA **under protest, and on a provisional basis**. More specifically, on November 20, 2024, the FAA issued a Notice to Alex Air Inc. (the "Notice") in which the FAA proposed to archive Alex Air Inc.'s. existing OpSpecs paragraph B048. The Notice appears to rely on the FAA's issuance of Advisory Circular 136-4 ("AC 136-4"). Alex Air Inc. has responded to the Notice in detail, explaining why the FAA should not archive the existing B048. Alex Air Inc. continues to object to the FAA's attempts to archive its existing B048, and further objects to any attempts by the FAA to rely upon or utilize AC 136-4 to modify or limit Alex Air Inc.'s. current operating authority as set forth in its existing manuals, including but not limited to the existing B048.

As evidenced by the Notice, AC 136-4, and other issuances by the FAA (including Notice N8900.718, and Change 943 to FAA Order 8900.1, vol. 3, chap. 18, § 3-816), it is clear that the FAA intends to subject Alex Air Inc. and other Hawaii air tour Alex Air Inc.s to new restrictions, relying at least in part upon the provisions of AC 136-4, beginning no later than May 11, 2025. This expedited transition threatens aviation safety. In an abundance of caution, and in the interest of the safety of its passengers, Alex Air Inc. has no choice but to submit the Proposed Manual, solely as a stopgap measure while Alex Air Inc.'s. challenges to the FAA's recent actions move forward.



Alex Air Inc. desires to continue to operate in accordance with its existing B048 which the FAA has now proposed to archive. Thus, in the event the FAA withdraws its proposed archiving of Alex Air Inc.'s existing B048, then the FAA should consider this submission of the Proposed Manual to be withdrawn. Likewise, even if the Proposed Manual is approved, Alex Air Inc.'s challenges to the FAA's recent actions will continue to move forward; but in the event Alex Air Inc. is ultimately successful in challenging the FAA's actions in archiving B048 and/or the issuance of AC 136-4 and related orders/notices, then the Alex Air Inc. intends to continue to operate under its existing B048 and the submission of this Proposed Manual should be considered withdrawn. Nothing in this conditional submission, made under protest, shall constitute a waiver of any rights, remedies, or claims of Alex Air Inc., including but not limited to those with respect to its existing B048, the proposed archiving, AC 136-4, and/or related notices/orders.

Thank you for your attention to this matter.

Sincerely,

Brent Armenta
Director of Operations
Alex Air Inc.
1620 Jet Stream Dr.
Henderson, NV 89052
626-252-5647

Enclosure:
Hawaii Tour Alex Air Inc. Manual, Rev. 1

January 22, 2025

VIA EMAIL TO 7-AWP-HNL-FSDO@faa.gov

U.S. Department of Transportation
Federal Aviation Administration
Honolulu Flight Standards District Office
Attn: Joseph Monfort
135 Nakolo Place
Honolulu, HI 96819-1845

Re: Aloha Helicopter Tours, LLC (“Operator”)
Submission of proposed Hawaii Tour Operator B048/B548 Manual

Dear Mr. Monfort:

This letter serves as a formal request for FAA approval of the new paragraph B048/B548 of Operator’s Operations Specifications (OpSpecs), in accordance with the enclosed Hawaii Tour Operator Manual, Revision 1, dated January 21, 2025 (the “Proposed Manual”), for continued use by Aloha Helicopter Tours, LLC. A copy of the Proposed Manual is submitted with this letter.

Please note that the Proposed Manual is being submitted to the FAA **under protest, and on a provisional basis**. More specifically, on November 20, 2024, the FAA issued a Notice to Aloha Helicopter Tours, LLC (the “Notice”) in which the FAA proposed to archive Aloha Helicopter Tours, LLC existing OpSpecs paragraph B048/B548. The Notice appears to rely on the FAA’s issuance of Advisory Circular 136-4 (“AC 136-4”). Aloha Helicopter Tours, LLC has responded to the Notice in detail, explaining why the FAA should not archive the existing B048/B548. Aloha Helicopter Tours, LLC continues to object to the FAA’s attempts to archive its existing B048/B548, and further objects to any attempts by the FAA to rely upon or utilize AC 136-4 to modify or limit Aloha Helicopter Tours, LLC current operating authority as set forth in its existing manuals, including but not limited to the existing B048.

As evidenced by the Notice, AC 136-4, and other issuances by the FAA (including Notice N8900.718, and Change 943 to FAA Order 8900.1, vol. 3, chap. 18, § 3-816), it is clear that the FAA intends to subject Aloha Helicopter Tours, LLC and other Hawaii air tour operators to new restrictions, relying at least in part upon the provisions of AC 136-4, beginning no later than May 11, 2025. This expedited transition threatens aviation safety. In an abundance of caution, and in the interest of the safety of its passengers, Aloha Helicopter Tours, LLC has no choice but to submit the Proposed Manual, solely as a stopgap measure while Aloha Helicopter Tours, LLC challenges to the FAA’s recent actions move forward.

Aloha Helicopter Tours, LLC desires to continue to operate in accordance with its existing B048/B548 which the FAA has now proposed to archive. Thus, in the event the FAA withdraws its proposed archiving of Aloha Helicopter Tours, LLC existing B048/B548, then the FAA should consider this submission of the Proposed Manual to be withdrawn. Likewise, even if the Proposed Manual is approved, Operator’s challenges to the FAA’s recent actions will continue to move

forward; but in the event Aloha Helicopter Tours, LLC is ultimately successful in challenging the FAA's actions in archiving B048/B548 and/or the issuance of AC 136-4 and related orders/notices, then the Aloha Helicopter Tours, LLC intends to continue to operate under its existing B048/B548 and the submission of this Proposed Manual should be considered withdrawn. Nothing in this conditional submission, made under protest, shall constitute a waiver of any rights, remedies, or claims of Aloha Helicopter Tours, LLC, including but not limited to those with respect to its existing B048/B548, the proposed archiving, AC 136-4, and/or related notices/orders.

Thank you for your attention to this matter.

Sincerely,

William Zeffiro
Member

Enclosure:
Hawaii Tour Operator Manual, Rev. 1

January 23, 2025

VIA EMAIL TO 7-AWP-HNL-FSDO@faa.gov

U.S. Department of Transportation
Federal Aviation Administration
Honolulu Flight Standards District Office
Seth W Cossel POI WP13
135 Nakolo Place
Honolulu, HI 96819-1845

Re: Aris, Inc
Submission of proposed Hawaii Tour Operator B048 Manual

Dear Mr. Cossel:

This letter serves as a formal request for FAA approval of the new paragraph B048 of Aris, Inc.'s Operations Specifications (OpSpecs), in accordance with the enclosed Hawaii Tour Aris, Inc. Manual, Revision 1, dated January 21, 2025 (the "Proposed Manual"), for continued use by Aris, Inc. A copy of the Proposed Manual is submitted with this letter.

Please note that the Proposed Manual is being submitted to the FAA **under protest, and on a provisional basis**. More specifically, on November 20, 2024, the FAA issued a Notice to Aris, Inc. (the "Notice") in which the FAA proposed to archive Aris, Inc.'s existing OpSpecs paragraph B048. The Notice appears to rely on the FAA's issuance of Advisory Circular 136-4 ("AC 136-4"). Aris, Inc. has responded to the Notice in detail, explaining why the FAA should not archive the existing B048. Aris, Inc. continues to object to the FAA's attempts to archive its existing B048, and further objects to any attempts by the FAA to rely upon or utilize AC 136-4 to modify or limit Aris, Inc.'s current operating authority as set forth in its existing manuals, including but not limited to the existing B048.

As evidenced by the Notice, AC 136-4, and other issuances by the FAA (including Notice N8900.718, and Change 943 to FAA Order 8900.1, vol. 3, chap. 18, § 3-816), it is clear that the FAA intends to subject Aris, Inc. and other Hawaii air tour Aris, Inc.'s to new restrictions, relying at least in part upon the provisions of AC 136-4, beginning no later than May 11, 2025. This expedited transition threatens aviation safety. In an abundance of caution, and in the interest of the safety of its passengers, Aris, Inc. has no choice but to submit the Proposed Manual, solely as a stopgap measure while Aris, Inc.'s challenges to the FAA's recent actions move forward.

Aris, Inc. desires to continue to operate in accordance with its existing B048 which the FAA has now proposed to archive. Thus, in the event the FAA withdraws its proposed archiving of Aris, Inc.'s existing B048, then the FAA should consider this submission of the Proposed Manual to be withdrawn. Likewise, even if the Proposed Manual is approved, Aris, Inc.'s challenges to the FAA's recent actions will continue to move forward; but in the event Aris, Inc. is ultimately successful in challenging the FAA's actions in archiving B048 and/or the issuance of AC 136-4 and related orders/notices, then the Aris, Inc. intends to continue to operate under its

existing B048 and the submission of this Proposed Manual should be considered withdrawn. Nothing in this conditional submission, made under protest, shall constitute a waiver of any rights, remedies, or claims of Aris, Inc., including but not limited to those with respect to its existing B048, the proposed archiving, AC 136-4, and/or related notices/orders.

Thank you for your attention to this matter.

Sincerely,

Richard Olsten
Director of Operations, Aris, Inc.
MH9A643Y
(808) 357-4150
Richie@AirMaui.com

Enclosure:

Hawaii Tour Operator Aris, Inc. Manual, Rev. 1

January 23, 2025

VIA EMAIL TO 7-AWP-HNL-FSDO@faa.gov

U.S. Department of Transportation
Federal Aviation Administration
Honolulu Flight Standards District Office
Seth W Cossel POI WP13
135 Nakolo Place
Honolulu, HI 96819-1845

Re: Aris Nevada, Inc.
Submission of proposed Hawaii Tour Operator B048 Manual

Dear Mr. Cossel:

This letter serves as a formal request for FAA approval of the new paragraph B048 of Aris Nevada, Inc.'s Operations Specifications (OpSpecs), in accordance with the enclosed Hawaii Tour Aris Nevada, Inc. Manual, Revision 1, dated January 21, 2025 (the "Proposed Manual"), for continued use by Aris Nevada, Inc. A copy of the Proposed Manual is submitted with this letter.

Please note that the Proposed Manual is being submitted to the FAA **under protest, and on a provisional basis**. More specifically, on November 20, 2024, the FAA issued a Notice to Aris Nevada, Inc. (the "Notice") in which the FAA proposed to archive Aris Nevada, Inc.'s existing OpSpecs paragraph B048. The Notice appears to rely on the FAA's issuance of Advisory Circular 136-4 ("AC 136-4"). Aris Nevada, Inc. has responded to the Notice in detail, explaining why the FAA should not archive the existing B048. Aris Nevada, Inc. continues to object to the FAA's attempts to archive its existing B048, and further objects to any attempts by the FAA to rely upon or utilize AC 136-4 to modify or limit Aris Nevada, Inc.'s current operating authority as set forth in its existing manuals, including but not limited to the existing B048.

As evidenced by the Notice, AC 136-4, and other issuances by the FAA (including Notice N8900.718, and Change 943 to FAA Order 8900.1, vol. 3, chap. 18, § 3-816), it is clear that the FAA intends to subject Aris Nevada, Inc. and other Hawaii air tour Aris Nevada, Inc.'s to new restrictions, relying at least in part upon the provisions of AC 136-4, beginning no later than May 11, 2025. This expedited transition threatens aviation safety. In an abundance of caution, and in the interest of the safety of its passengers, Aris Nevada, Inc. has no choice but to submit the Proposed Manual, solely as a stopgap measure while Aris Nevada, Inc.'s challenges to the FAA's recent actions move forward.

Aris Nevada, Inc. desires to continue to operate in accordance with its existing B048 which the FAA has now proposed to archive. Thus, in the event the FAA withdraws its proposed archiving of Aris Nevada, Inc.'s existing B048, then the FAA should consider this submission of the Proposed Manual to be withdrawn. Likewise, even if the Proposed Manual is approved, Aris Nevada, Inc.'s challenges to the FAA's recent actions will continue to move forward; but in the event Aris Nevada, Inc. is ultimately successful in challenging the FAA's actions in archiving

B048 and/or the issuance of AC 136-4 and related orders/notices, then the Aris Nevada, Inc. intends to continue to operate under its existing B048 and the submission of this Proposed Manual should be considered withdrawn. Nothing in this conditional submission, made under protest, shall constitute a waiver of any rights, remedies, or claims of Aris Nevada, Inc., including but not limited to those with respect to its existing B048, the proposed archiving, AC 136-4, and/or related notices/orders.

Thank you for your attention to this matter.

Sincerely,

Richard Olsten
Agent for Service, Aris Nevada, Inc.
9L1A308O
(808) 357-4150
Richie@AirMaui.com

Enclosure:
Hawaii Tour Operator Aris Nevada, Inc. Manual, Rev. 1



January 24, 2025

U.S. Department of Transportation
Federal Aviation Administration
Honolulu Flight Standards District Office
Seth Cossel
135 Nakolo Place
Honolulu, HI 96819-1845

Re: Hawaii Pacific Aviation, Inc. DBA Mauna Loa Helicopter
Submission of proposed Hawaii Tour Operator B048 Manual

Dear Mr. Cossel

This letter serves as a formal request for FAA approval of the new paragraph B048 of Operator's Operations Specifications (OpSpecs), in accordance with the enclosed Hawaii Tour Operator Manual, Revision 1, dated January 21, 2025 (the "Proposed Manual"), for continued use by Hawaii Pacific Aviation, Inc. A copy of the Proposed Manual is submitted with this letter.

Please note that the Proposed Manual is being submitted to the FAA **under protest, and on a provisional basis**. More specifically, on November 20, 2024, the FAA issued a Notice to Hawaii Pacific Aviation, Inc (the "Notice") in which the FAA proposed to archive Hawaii Pacific Aviation, Inc's existing OpSpecs paragraph B048. The Notice appears to rely on the FAA's issuance of Advisory Circular 136-4 ("AC 136-4"). Hawaii Pacific Aviation, Inc has responded to the Notice in detail, explaining why the FAA should not archive the existing B048. Hawaii Pacific Aviation, Inc continues to object to the FAA's attempts to archive its existing B048, and further objects to any attempts by the FAA to rely upon or utilize AC 136-4 to modify or limit Hawaii Pacific Aviation, Inc's current operating authority as set forth in its existing manuals, including but not limited to the existing B048.

As evidenced by the Notice, AC 136-4, and other issuances by the FAA (including Notice N8900.718, and Change 943 to FAA Order 8900.1, vol. 3, chap. 18, § 3-816), it is clear that the FAA intends to subject Hawaii Pacific Aviation, Inc and other Hawaii air tour operators to new restrictions, relying at least in part upon the provisions of AC 136-4, beginning no later than May 11, 2025. This expedited transition threatens aviation safety. In an abundance of caution, and in the interest of the safety of its passengers, Hawaii Pacific Aviation, Inc has no choice but to submit the Proposed Manual, solely as a stopgap measure while Hawaii Pacific Aviation, Inc's challenges to the FAA's recent actions move forward.

Hawaii Pacific Aviation, Inc desires to continue to operate in accordance with its existing B048 which the FAA has now proposed to archive. Thus, in the event the FAA withdraws its proposed archiving of Hawaii Pacific Aviation, Inc's existing B048, then the FAA should consider this submission of the Proposed Manual to be withdrawn. Likewise, even if the Proposed Manual is approved, Operator's challenges to the FAA's recent actions will continue to move forward; but in the event Hawaii Pacific Aviation, Inc is ultimately successful in challenging the FAA's actions in archiving B048 and/or the issuance of AC 136-4 and related orders/notices, then the Hawaii Pacific Aviation, Inc intends to continue to operate under its existing B048 and the submission of this Proposed Manual should be considered withdrawn. Nothing in this conditional submission, made under protest, shall constitute a waiver of any rights, remedies, or claims of Hawaii Pacific Aviation, Inc, including but not limited to those with respect to its existing B048, the proposed archiving, AC 136-4, and/or related notices/orders.

Thank you for your attention to this matter.

Sincerely,



Kalei Gregory
Director of Operations

Enclosure:
Hawaii Tour Operator Manual, Rev. 1



January 23, 2025

U.S. Department of Transportation
Federal Aviation Administration
Honolulu Flight Standards District Office
Seth Cossel
135 Nakolo Place
Honolulu, HI 96819-1845

Re: Island Helicopters Kauai, Inc. ("Island Helicopters")
Submission of proposed Hawaii Tour Operator B048 Manual

Dear Seth,

This letter serves as a formal request for FAA approval of the new paragraph B048 of Island Helicopters' Operations Specifications (OpSpecs), in accordance with the enclosed Hawaii Tour Operator Manual, Revision 1, dated January 21, 2025 (the "Proposed Manual"), for continued use by Island Helicopters. A copy of the Proposed Manual is submitted with this letter.

Please note that the Proposed Manual is being submitted to the FAA **under protest, and on a provisional basis**. More specifically, on November 20, 2024, the FAA issued a Notice to Operator (the "Notice") in which the FAA proposed to archive Island Helicopters' existing OpSpecs paragraph B048. The Notice appears to rely on the FAA's issuance of Advisory Circular 136-4 ("AC 136-4"). Island Helicopters has responded to the Notice in detail, explaining why the FAA should not archive the existing B048. Island Helicopters continues to object to the FAA's attempts to archive its existing B048, and further objects to any attempts by the FAA to rely upon or utilize AC 136-4 to modify or limit Island Helicopters' current operating authority as set forth in its existing manuals, including but not limited to the existing B048.

As evidenced by the Notice, AC 136-4, and other issuances by the FAA (including Notice N8900.718, and Change 943 to FAA Order 8900.1, vol. 3, chap. 18, § 3-816), it is clear that the FAA intends to subject Island Helicopters and other Hawaii air tour operators to new restrictions, relying at least in part upon the provisions of AC 136-4, beginning no later than May 11, 2025. This expedited transition threatens aviation safety. In an abundance of caution, and in the interest of the safety of its passengers, Island Helicopters has no choice but to submit the Proposed Manual, solely as a stopgap measure while Island Helicopters' challenges to the FAA's recent actions move forward.

Island Helicopters desires to continue to operate in accordance with its existing B048 which the FAA has now proposed to archive. Thus, in the event the FAA withdraws its proposed archiving of Island Helicopters' existing B048, then the FAA should consider this submission of the Proposed Manual to be withdrawn.

Likewise, even if the Proposed Manual is approved, Island Helicopters challenges to the FAA's recent actions will continue to move forward; but in the event Island Helicopters is ultimately successful in challenging the FAA's actions in archiving B048 and/or the issuance of AC 136-4 and related orders/notices, then Island Helicopters intends to continue to operate under its existing B048 and the submission of this Proposed Manual should be considered withdrawn. Nothing in this conditional submission, made under protest, shall constitute a waiver of any rights, remedies, or claims of Island Helicopters, including but not limited to those with respect to its existing B048, the proposed archiving, AC 136-4, and/or related notices/orders.

Thank you for your attention to this matter.

Sincerely,



Curt Lofstedt
CEO & Owner
Island Helicopters Kauai, Inc.

Enclosure:

Hawaii Tour Operator Manual, Rev. 1



January 23, 2025

VIA EMAIL TO 7-AWP-HNL-FSDO@faa.gov

U.S. Department of Transportation
Federal Aviation Administration
Honolulu Flight Standards District Office
Inspector Seth Cossel
135 Nakolo Place
Honolulu, HI 96819-1845

Re: Jack Harter Helicopters, Inc. ("Operator")
Submission of proposed Hawaii Tour Operator B048 Manual

Dear Inspector Cossel:

This letter serves as a formal request for FAA approval of the new paragraph B048 of Operator's Operations Specifications (OpSpecs), in accordance with the enclosed Hawaii Tour Operator Manual, Revision 1, dated January 21, 2025 (the "Proposed Manual"), for continued use by Operator. A copy of the Proposed Manual is submitted with this letter.

Please note that the Proposed Manual is being submitted to the FAA **under protest, and on a provisional basis**. More specifically, on November 20, 2024, the FAA issued a Notice to Operator (the "Notice") in which the FAA proposed to archive Operator's existing OpSpecs paragraph B048. The Notice appears to rely on the FAA's issuance of Advisory Circular 136-4 ("AC 136-4"). Operator has responded to the Notice in detail, explaining why the FAA should not archive the existing B048. Operator continues to object to the FAA's attempts to archive its existing B048, and further objects to any attempts by the FAA to rely upon or utilize AC 136-4 to modify or limit Operator's current operating authority as set forth in its existing manuals, including but not limited to the existing B048.

As evidenced by the Notice, AC 136-4, and other issuances by the FAA (including Notice N8900.718, and Change 943 to FAA Order 8900.1, vol. 3, chap. 18, § 3-816), it is clear that the FAA intends to subject Operator and other Hawaii air tour operators to new restrictions, relying at least in part upon the provisions of AC 136-4, beginning no later than May 11, 2025. This expedited transition threatens aviation safety. In an abundance of caution, and in the interest of the safety of its passengers, Operator has no choice but to submit the Proposed Manual, solely as a stopgap measure while Operator's challenges to the FAA's recent actions move forward.

Operator desires to continue to operate in accordance with its existing B048 which the FAA has now proposed to archive. Thus, in the event the FAA withdraws its proposed archiving of Operator's existing B048, then the FAA should consider this submission of the Proposed Manual to be withdrawn. Likewise, even if the Proposed Manual is approved, Operator's challenges to the FAA's recent actions will continue to move forward; but in the event Operator is ultimately successful in challenging the FAA's actions in archiving B048 and/or the issuance of AC 136-4 and related orders/notices, then the Operator intends to continue to operate under its existing B048 and the submission of this Proposed Manual should be considered withdrawn. Nothing in this conditional submission, made under protest, shall constitute a waiver of any rights, remedies, or claims of Operator, including but not limited to those with respect to its existing B048, the proposed archiving, AC 136-4, and/or related notices/orders.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink that reads "Casey Riemer". The signature is written in a cursive, flowing style.

Casey Riemer
Special Projects Manager

Enclosure:
Hawaii Tour Operator Manual, Rev. 1



155 Kapalulu Place Suite 197 Honolulu, HI 96819
C: 808 492 8711 | O: 808 492 8706
rainbowhelicopters.com

January 24, 2025

VIA EMAIL TO 7-AWP-HNL-FSDO@faa.gov

U.S. Department of Transportation
Federal Aviation Administration
Honolulu Flight Standards District Office
Seth Cossel
135 Nakolo Place
Honolulu, HI 96819-1845

Re: Rainbow Helicopters ("Operator")

Submission of proposed Hawaii Tour Operator B048 Manual

Dear Mr. Cossel:

This letter serves as a formal request for FAA approval of the new paragraph B048 of Rainbow Helicopter's Operations Specifications (OpSpecs), in accordance with the enclosed Hawaii Tour Operator Manual, Revision 1, dated January 21, 2025 (the "Proposed Manual"), for continued use by Rainbow Helicopters. A copy of the Proposed Manual is submitted with this letter.

Please note that the Proposed Manual is being submitted to the FAA **under protest, and on a provisional basis**. More specifically, on November 20, 2024, the FAA issued a Notice to Rainbow Helicopters (the "Notice") in which the FAA proposed to archive Rainbow Helicopters existing OpSpecs paragraph B048. The Notice appears to rely on the FAA's issuance of Advisory Circular 136-4 ("AC 136-4"). Rainbow Helicopters has responded to the Notice in detail, explaining why the FAA should not archive the existing B048. Rainbow Helicopters continues to object to the FAA's attempts to archive its existing B048, and further objects to any attempts by the FAA to rely upon or utilize AC 136-4 to modify or limit Rainbow Helicopters current operating authority as set forth in its existing manuals, including but not limited to the existing B048.

As evidenced by the Notice, AC 136-4, and other issuances by the FAA (including Notice N8900.718, and Change 943 to FAA Order 8900.1, vol. 3, chap. 18, § 3-816), it is clear that the FAA intends to subject Rainbow Helicopters and other Hawaii air tour operators to new restrictions, relying at least in part upon the provisions of AC 136-4, beginning no later than May 11, 2025. This expedited transition threatens aviation safety. In an abundance of caution, and in the interest of the safety of its passengers, Rainbow Helicopters has no choice but to submit the



155 Kapalulu Place Suite 197 Honolulu, HI 96819
C: 808 492 8711 | O: 808 492 8706
rainbowhelicopters.com

Proposed Manual, solely as a stopgap measure while Rainbow Helicopters challenges to the FAA's recent actions move forward.

Rainbow Helicopters desires to continue to operate in accordance with its existing B048 which the FAA has now proposed to archive. Thus, in the event the FAA withdraws its proposed archiving of Rainbow Helicopters existing B048, then the FAA should consider this submission of the Proposed Manual to be withdrawn. Likewise, even if the Proposed Manual is approved, Rainbow Helicopters challenges to the FAA's recent actions will continue to move forward; but in the event Rainbow Helicopters is ultimately successful in challenging the FAA's actions in archiving B048 and/or the issuance of AC 136-4 and related orders/notices, then the Rainbow Helicopters intends to continue to operate under its existing B048 and the submission of this Proposed Manual should be considered withdrawn. Nothing in this conditional submission, made under protest, shall constitute a waiver of any rights, remedies, or claims of Rainbow Helicopters, including but not limited to those with respect to its existing B048, the proposed archiving, AC 136-4, and/or related notices/orders.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink that reads "Nicole Battjes". The signature is written in a cursive, flowing style.

Nicole Battjes,
CEO and Director of Operations

Enclosure:

Hawaii Tour Operator Manual, Rev. 1



(800) 326-3356
P.O. Box 1941
Lihue, HI 96766

January 24, 2025

VIA EMAIL TO 7-AWP-HNL-FSDO@faa.gov

U.S. Department of Transportation
Federal Aviation Administration
Honolulu Flight Standards District Office
POI Seth Cossel
135 Nakolo Place
Honolulu, HI 96819-1845

Re: Safari Aviation Inc.

Submission of proposed Hawaii Tour Operator B048 Manual

Dear Mr. Cossel:

This letter serves as a formal request for FAA approval of the new paragraph B048 of Operator's Operations Specifications (OpSpecs), in accordance with the enclosed Hawaii Tour Operator Manual, Revision 1, dated January 21, 2025 (the "Proposed Manual"), for continued use by Safari Aviation Inc. A copy of the Proposed Manual is submitted with this letter.

Please note that the Proposed Manual is being submitted to the FAA **under protest, and on a provisional basis**. More specifically, on November 20, 2024, the FAA issued a Notice to Operator (the "Notice") in which the FAA proposed to archive Safari Aviation Inc. existing OpSpecs paragraph B048. The Notice appears to rely on the FAA's issuance of Advisory Circular 136-4 ("AC 136-4"). Safari Aviation Inc. has responded to the Notice in detail, explaining why the FAA should not archive the existing B048. Safari Aviation Inc. continues to object to the FAA's attempts to archive its existing B048, and further objects to any attempts by the FAA to rely upon or utilize AC 136-4 to modify or limit Safari Aviation Inc. current operating authority as set forth in its existing manuals, including but not limited to the existing B048.

As evidenced by the Notice, AC 136-4, and other issuances by the FAA (including Notice N8900.718, and Change 943 to FAA Order 8900.1, vol. 3, chap. 18, § 3-816), it is clear that the FAA intends to subject Safari Aviation Inc. and other Hawaii air tour operators to new restrictions, relying at least in part upon the provisions of AC 136-4, beginning no later than May 11, 2025. This expedited transition threatens aviation safety. In an abundance of caution, and in the interest of the safety of its passengers, Safari Aviation Inc. has no choice but to submit the Proposed Manual, solely as a stopgap measure while Safari Aviation Inc. s challenges to the FAA's recent actions move forward.

Safari Aviation Inc. desires to continue to operate in accordance with its existing B048 which the FAA has now proposed to archive. Thus, in the event the FAA withdraws its proposed archiving of Safari Aviation Inc. existing B048, then the FAA should consider this submission of the Proposed Manual to be withdrawn. Likewise, even if the Proposed Manual is approved, Operator's challenges to the FAA's recent actions will continue to move forward; but in the event

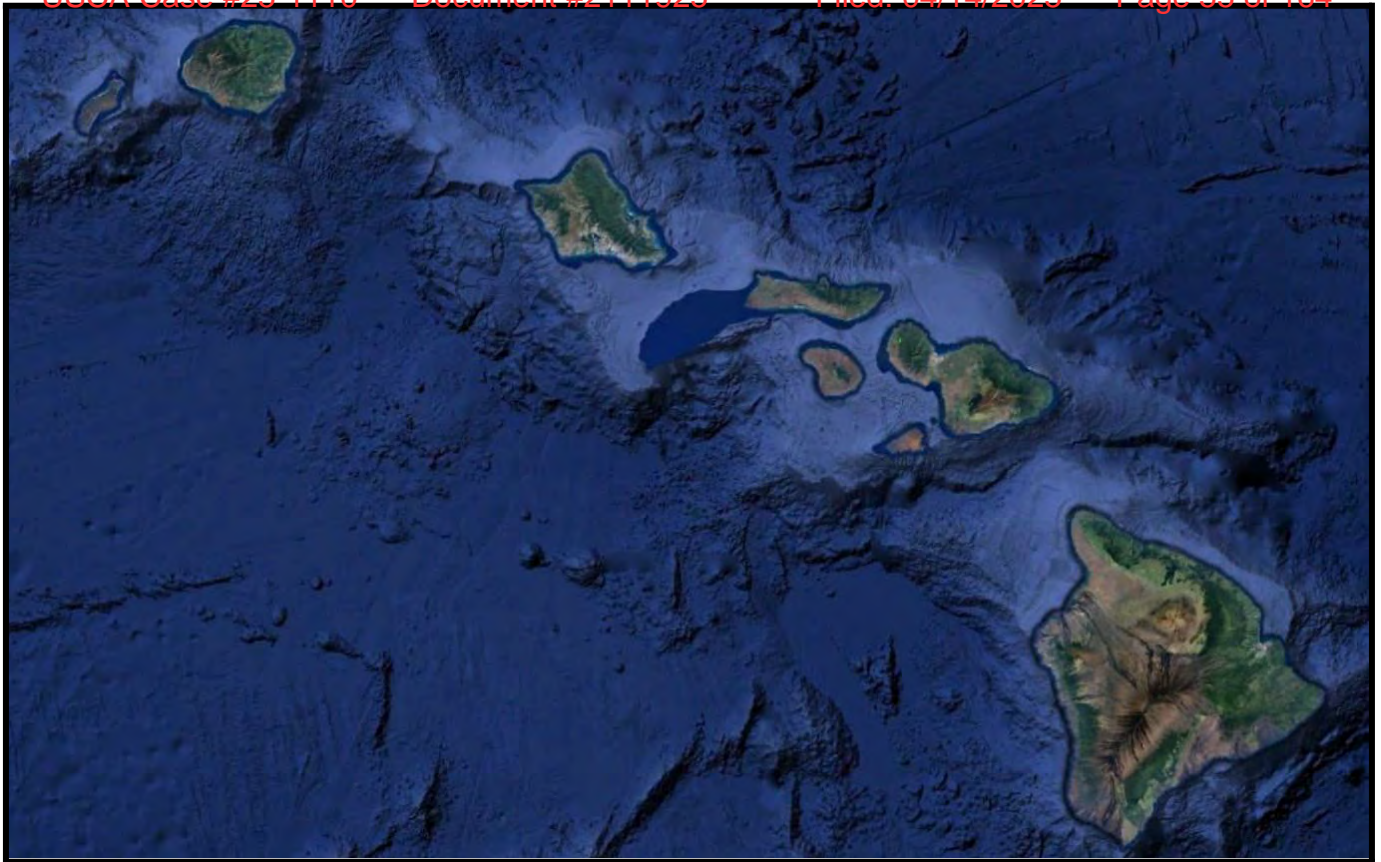
Safari Aviation Inc. is ultimately successful in challenging the FAA's actions in archiving B048 and/or the issuance of AC 136-4 and related orders/notices, then the Safari Aviation Inc. intends to continue to operate under its existing B048 and the submission of this Proposed Manual should be considered withdrawn. Nothing in this conditional submission, made under protest, shall constitute a waiver of any rights, remedies, or claims of Safari Aviation Inc., including but not limited to those with respect to its existing B048, the proposed archiving, AC 136-4, and/or related notices/orders.

Thank you for your attention to this matter.

Sincerely,

J.C. Murphy
Director of Operations
Safari Aviation Inc.
808-222-5887
murphy@safarihelicopters.com

Enclosure:
Hawaii Tour Operator Manual, Rev. 1



Hawai'i – Tour Operator B048 Manual

PURPOSE: This manual establishes policy and procedures for deviation from the 1,500' above the surface altitude restriction as prescribed in 14 CFR Part 136, Subpart D, Paragraph (d)(2) thru the issuance of Operations Specifications (OpSpecs) B048, for 14 CFR part 135 air tour operators.

This manual considers current 14 CFR, current letters of agreement, industry best practices, National Transportation Safety Board (NTSB) Safety Recommendations, air tour operator agreements, ATMP and air traffic agreements. This manual does not provide relief to current regulation, other than to permit deviation from 14 CFR Part 136, Subpart D, Paragraph (d)(2) .

DISTRIBUTION: Air Tour Operator, HNL FSDO

CUSTODIAN: Air Tour Operator

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CHAPTER 1. GENERAL INFORMATION

- 1) **Deviation Authority.** Certain Title 14 Code of Federal Regulation (14CFR) sections allow the Administrator to issue a Certificate of Waiver, a Certificate of Authorization, OpSpecs, or MSpecs, which authorizes a deviation to a regulatory requirement. These actions permit a person or an organization to either deviate from a specific regulation or comply with special alternative provisions, conditions, or limitations that provide for an equivalent level of safety. This regulatory flexibility is available to the Administrator when the specific regulatory section stipulates that it is available. When deviation authority is available, the regulation will state the following:
 - a) “Unless otherwise authorized by the Administrator,”
 - b) “The Administrator may,”
 - c) “If the Administrator finds,”
 - d) “The Administrator may authorize,”
 - e) “The Administrator allows a deviation,”
 - f) “Notwithstanding the Administrator may issue operations specifications,”
- 2) **The Code.** Title 14 CFR Part 136, Subpart D, Paragraph (d)(2), states;
Minimum flight altitudes. *Except when necessary for takeoff and landing, or operating in compliance with an air traffic control clearance, or as otherwise authorized by the Administrator, no person may conduct an air tour in Hawaii:*
 - a) **Below an altitude of 1,500 feet above the surface over all areas of the State of Hawaii, and,**
 - b) *Closer than 1,500 feet to any person or property or,*
 - c) *Below any altitude prescribed by federal statute or regulation.*
- 3) The administrator has determined that if an operator is going to seek the deviation authority to conduct commercial air tour operations below 1,500’ above the surface in the State of Hawaii, the operator must incorporate the programs, processes, and procedures contained within this manual and create an acceptable training program for its pilots before such deviation authority will be issued to the commercial air tour operator.
- 4) All pilots must be knowledgeable of this manual and abide by the contents, herein, as circumstances and safety permit.
- 5) The provisions, operating limitations, processes and procedures contained in this manual are only applicable to commercial air tour flights conducted below 1,500’ above the surface in the State of Hawaii.

Definitions, Abbreviations and Terms

Air Tour Management Plan (ATMP) - As stated in Title 49 of the United States Code (49 U.S.C.) § 40128(b)(1)(A), documents established by the Administrator, in cooperation with the Director of National Parks Service, for any national park or tribal land for which such a plan is not in effect whenever a person applies for authority to conduct a commercial air tour operation over the park.

Commercial Air Tour Flight Profile (CATFP) - For the purposes of OpSpec/LOA B048, the lateral flight path and altitude above the surface that the tour pilot will fly from the departure point to the first Known Site Specific Area (KSSA), then via a flight path through a transition area designed to allow for lateral flight path options to avoid IMC, sensitive locations, and repetitive flights over the same lateral path at appropriate altitudes, to the next KSSA in a sequence of KSSAs, and return to departure point. The CHs or operators define their CATFPs in consideration of transition area, sensitive locations and areas, island-specific weather patterns, location and restrictions associated with units of the National Park System (NPS), prohibited areas, or restricted areas, temporary flight restrictions (TFR), etc. Each specific CH or operator may offer flight profiles to the public as individual flights or as part of a larger travel arrangement package. (National Park Service is commonly abbreviated as NPS; however, this AC uses NPS to refer to the National Park System.)

Commercial Air Tour Operation - As defined under 14 CFR part 110, § 110.2 and part 136, § 136.1(d), a flight conducted for compensation or hire in an airplane or helicopter where a purpose of the flight is sightseeing. The FAA may consider the following factors in determining whether a flight is a commercial air tour:

- Whether there was a holding out to the public of willingness to conduct a sightseeing flight for compensation or hire;
- Whether the person offering the flight provided a narrative that referred to areas or points of interest on the surface below the route of the flight;
- The area of operation;
- How often the person offering the flight conducts such flights;
- The route of the flight;
- The inclusion of sightseeing flights as part of any travel arrangement package;
- Whether the flight in question would have been canceled based on poor visibility of the surface below the route of the flight; and
- Any other factors that the FAA considers appropriate.

Cue-Based Weather Training - For the purposes of OpSpec/LOA B048, training that enables the pilot to evaluate weather patterns based on visual cues, and to determine from those cues if it is appropriate to continue the flight as planned or if an alternate plan is necessary. This training may include, but is not limited to, PowerPoint presentations, video or pictorial examples, and actual flights to train and evaluate the pilot's ability to evaluate visual cues.

Flight/Ground Observation - For the purposes of OpSpec/LOA B048, each candidate Hawaii air tour pilot should undergo a ground observation and a flight observation. Observations are conducted by the Administrator, a person approved by the Administrator for the CH, or a person designated by the § 91.147 operator. During the ground observation, the candidate should demonstrate competency in the knowledge and skills and the important safety and administrative aspects of the conditions and limitations of the OpSpec/LOA B048 authorization and part 136 as applied when planning commercial air tour operations. During the flight observation, the candidate Hawaii air tour pilot flies an aircraft through a representative CATFP and demonstrates appropriate navigation, altitude maintenance, cue-based weather evaluation and aeronautical decision making, radio calls, operator-accepted and published KSSA procedures, pilot weather reporting techniques, traffic awareness and avoidance, compliance with ATMP restrictions, and avoidance of culturally sensitive locations within transition areas.

Interim Operating Authority (IOA) - Interim authority that is granted upon application for operating authority by the Administrator under § 136.41 to a commercial air tour operator for commercial air tour operations over a national park or tribal land for which the operator is an existing commercial air tour operator, as defined by § 136.33(b).

Known Site Specific Area (KSSA) - For the purposes of OpSpec/LOA B048, an area designated and designed by the commercial air tour operator where an aircraft may fly and/or maneuver for the purpose of conducting commercial air tour operations, as defined by § 136.1(d).

Park Unit - As designated by the National Park Service (NPS), a park unit is any area of land or water administered by the Secretary of the Interior through the NPS for park, monument, historic, parkway, recreational, or other purposes.

Razorback ridge - steep-sided narrow ridges of land which are found throughout the dramatic terrain in Hawaii. The prevailing AGL altitude within a Transition Area/Segment or KSSA is often bisected by a razor back ridge. It is not feasible for aircraft to continuously change altitude at each razor back ridge. Therefore, it is understood that pilots will maintain the appropriate regulatory altitudes within Transition Area/Segment or KSSA and cross the razor back sections within KSSA or Transition Area/Segments at no less than 200' ft. AGL at a 45-degree angle. The term "Razorback Ridge" only applies to specific accepted areas depicted on the island specific sections and maps in Chapter 3 of this manual.

Transition Segment - For the purposes of OpSpec/LOA B048, an area created, designed, and selected by the CH or operator that an aircraft may utilize for the purpose of transitioning from one KSSA on a CATFP to another KSSA while conducting commercial air tour operations, as defined by § 136.1(d). Further, it can be expected that tour aircraft will transition from KSSA to KSSA by the most direct means possible based on weather conditions, terrain, or traffic. This could mean transition will be point to point or utilize a circuitous route to avoid weather, terrain, or traffic.

Transition Areas allow helicopter operations at, or above, 500' above the surface only for rapidly changing weather, terrain, or traffic. Once past the weather, terrain or traffic, or an alternative route has been selected, the pilot is required to return to 1500' AGL or the depicted minimum altitude within that segment as soon as practicable.

Weather Shoreline Safety Area (WSSA) - If flying through a transition area and the prescribed transition area altitude does not allow a safe transition for weather, traffic, or terrain, a pilot may deviate into the WSSA (500'min) to continue a safe VFR transition but must return to the prescribed transition area altitude as soon as possible. The WSSA is depicted as the yellow area on the shoreline of every island and extends from the shoreline to 1 mile offshore.

Weather Enhanced Safety Area (WESA) - An area that allows helicopter operations between 1500 ft and 500 ft above the surface only for rapidly changing weather, terrain, or traffic. Once past the weather, terrain or traffic, or alternative route has been selected, the pilot is required to return to 1500 ft AGL as soon as practicable. In the event a pilot enters the WESA, he/she is required to submit a "WESA Report" to his/her Chief Pilot.

WESA are intended to increase the pilot's options for selecting safe routes through areas of weather, terrain, or high traffic. When operating below 1500ft AGL the pilot should be vigilantly and constantly scanning for suitable landing areas.

CHAPTER 2. DEVIATION MINIMUMS AND OPERATIONAL REQUIREMENTS

1-Record Keeping

- Performance plans, Weight and Balance Calculations and Flight Rosters shall be completed and retained in accordance with the company General Operations Manual (GOM).
- Maintenance Logs and Minimum Equipment Lists (MEL) shall be completed and retained in accordance with the company General Operations Manual (GOM).
- Training records will be completed and retained IAW with the Approved Flight Training Manual, GOM and this manual.

2-Safety Risk Analysis

- Before the first flight of the day, the PIC will complete a Flight Risk Analysis which will be filed at the base of operations. PIC will update the risk assessment before each additional flight.

3-Flight Altitudes

- a. Air tour aircraft are authorized to deviate from § 136.75(d)(1) to conduct commercial air tour operations below 1,500 feet above the ground for the purpose of remaining in VMC and of avoiding entering IMC that was not forecast or observed and reported, for traffic avoidance or a safety of flight issue.
- b. Air tour operations may not be conducted closer than 1,500 feet to any person or property.
- c. Accepted Razorback Ridgelines may be crossed at 200ft AGL or above and at a 45-degree angle to the ridge.
- d. All aircraft on air tour flights shall remain 200ft from all terrain at a minimum. Distance from the terrain should be such that the PIC always has possible landing sites in view.
- e. KSSA, Aircraft must remain 500ft above the lowest point within the KSSA (unless depicted as higher) or above the caution/warning/avoid area of the limiting height/velocity diagram (H/V curve). The PIC shall, at all times within a KSSA, have 500ft of cloud clearance above the aircraft regardless of the class of airspace. At all times in a KSSA the PIC must make a reasonable plan to operate the helicopter outside of the caution/warning/avoid area of the limiting height/velocity diagram (H/V curve).
- f. Transition area/segment altitudes will be set based on an average of prevailing altitudes and known weather patterns within that area or segment but are intended to keep the aircraft at a stable altitude over varying terrain. PIC will maintain 1500ft AGL unless otherwise depicted/written on the island Specific Map section. PIC can descend as low as 500ft AGL but must remain above the Height Velocity curve if unforeseen changing weather or traffic necessitates the descent. The pilot is required to return to 1500' AGL as soon as practicable.
- g. All tour pilots shall conduct operations in accordance with the maps and descriptions in Chapter 3 of this manual.
- h. Deviation Map Key:
 1. Clear Areas - Weather Enhanced Safety Area (WESA) – Areas that allows operations at, or above, 500' above the surface only for rapidly changing weather, terrain, or traffic. Once past the weather, terrain or traffic, or alternative route has been selected, the pilot is required to return to 1500' AGL (or depicted altitude) as soon as practicable.
 2. Yellow Shoreline Areas - Weather Shoreline Safety Area (WSSA) - If flying through a transition area and the prescribed transition area altitude does not allow a safe transition for weather, traffic, or terrain, a pilot may maneuver into the WSSA (500ft AGL minimum) to continue a safe VFR transition but must return to the prescribed transition area altitude or 1500ft AGL if not depicted, as soon as practicable. The WSSA is depicted as the yellow area on the shoreline of every island and extends from the shoreline to 1 mile offshore.
 3. Pink Areas – 1500ft AGL minimum
 4. Gray Areas – National Parks
 5. Green with Black Outline Areas – KSSA - Aircraft must remain 500ft above the lowest point within the KSSA (unless depicted as higher) or above the caution/warning/avoid area of the limiting height/velocity diagram (H/V curve). The PIC shall, at all times within a KSSA, have 500ft of cloud clearance above the aircraft regardless of the class of airspace. At all times in a KSSA the PIC must make a reasonable plan to operate the helicopter outside of the caution/warning/avoid area of the limiting height/velocity diagram (H/V curve).
 6. Blue Textured areas – Transition Areas/Segments. PIC will maintain 1500ft AGL unless otherwise depicted/written on the island Specific Map section. PIC can descend as low as 500ft AGL but must remain above the Height Velocity curve if unforeseen changing weather or traffic necessitates the descent. The pilot is required to return to 1500' AGL (or depicted altitude) as soon as practicable.
 7. Red Lines – Accepted Razor Back Ridgelines – 200 ft AGL Minimum crossing at 45-degree angle. When crossing a RR the PIC shall, at all times, have 500ft of cloud clearance above the aircraft regardless of the class of airspace.
 8. ATC Surface Areas - All altitudes will be as published by ATC or at the direction of ATC.

NOTE: It is understood that altitude transitions from one TA/S or KSSA to another cannot be immediate. Pilots will transition to published altitudes smoothly when they differ from one TA/S or KSSA to another.

4-Flight Visibility

- VFR commercial air tour operations below 1,500' above the surface, will be conducted with:
 - No less than three (3) statute miles' visibility on shore and no less than two (2) statute miles visibility offshore.

5-Preflight and In-Flight Weather Briefing

- The PIC will receive a current weather briefing prior to flight. This briefing shall be from the National Weather Service, Flight Service Station, a source approved by the National Weather Service, or a source approved by the administrator.
- When weather conditions are marginal or available weather information is minimal prior to departure, pilots should obtain updated weather information while en-route. En route sources may include Flight Service Stations (FSS), the CH's or operator's ground support personnel by discrete 2-way radio frequency or CTAF reports (PIREPS) that are either broadcast or solicited.
- Air Tour Pilots Shall utilize the FAA Weather Camera System, when available, to aid in determining weather conditions before flight.

6-Reporting Hazardous Weather

- Whenever a pilot encounters a potentially hazardous meteorological condition or an irregularity in a ground facility or navigation aid in flight, the knowledge of which the pilot considers essential to the safety of other flights, the pilot shall notify an appropriate ground radio station as soon as practicable.
- If a report of Hazardous weather is necessary, the communication to an ATC facility should include tail number or ATC-accepted call sign, position or area of flight (using accepted names of areas or cardinal directions and approximate distance from depicted waypoints along the CATFP), altitude, and intentions.
- To ensure Hazardous Weather Condition reports are not missed by other aircraft, any unnecessary conversation or "chatter" or both on accepted and/or published frequencies is highly discouraged while conducting commercial air tours (to include cruise flight through transition areas).

7-In Flight Go/No Go

During a tour, if a pilot is at a prescribed weather minimum, and does not have an approved weather source report, PIREP or cannot themselves see that the weather improves ahead, then the tour shall be discontinued in that direction.

- If an air tour pilot deviates below approved altitudes to avoid low ceilings and areas of reduced visibility over land and over water that were not forecast or reported, the pilot shall:
- Discontinue tour narratives, focus on flying the aircraft toward better weather conditions or make a precautionary off-airport landing.
- If an in-flight deviation requires immediate action or deviation of any of the requirements set forth in this manual, the pilot in command may deviate to the extent necessary to meet that circumstance. When conditions permit, the pilot may, at pilot discretion, resume tour operations.
- The pilot in command of an aircraft is directly responsible for, and is the final authority as to, the safe operation of that aircraft.
- Each person who deviates from the requirements set forth in this manual must report to the Chief Pilot or designated supervisor/manager within 24 hours of such deviation. Each person must comply with the requirements of 14 CFR Part 91.3 or 14 CFR Part 135.19 Emergency Authority regulations as applicable.

8-National Park Requirements

Independent from the authorization given through OpSpec/LOA B048, all commercial air tour operators must (per § 136.37) be authorized by OpSpec/LOA B057, as applicable, if they wish to conduct, or are currently conducting, operations over a national park under an ATMP, an IOA, or a VA within half a mile outside the boundary of any national park unit, or over an abutting tribal land, during which the aircraft flies (except as provided in § 136.35):

- Below 5,000 feet above the surface (except for the purpose of takeoff or landing, or to take action to ensure the safe operation of the aircraft), or
- Less than 1 mile laterally from any geographic feature within the park (unless more than half a mile outside the boundary).

9-WESA Reporting

The CATFP give a general overview of tour intentions. However, it is understood that pilots may need to use the WESA areas to avoid weather or traffic. Anytime pilots enter the WESA, a report shall be made to their Chief Pilot as soon as possible.

These reports will be de-identified, compiled and reviewed by the operators at the annual 136 meeting to identify any trends that may necessitate changes to this manual.

10-Prohibited Operations

- Special VFR departures
- Thrill rides – Anything that purposely breaks the parameters of this deviation manual or causes a low-g situation for the purpose of thrilling the passengers. (i.e. hammerheads).

CHAPTER 3. ISLAND DEVIATION MAPS AND PROCEDURES

Map Legend and Definitions (All Maps)

1. Clear Areas - Weather Enhanced Safety Areas (WESA) – An area that allows helicopter operations at, or above, 500' above the surface only for rapidly changing weather, terrain, or traffic. Once past the weather, terrain or traffic, or alternative route has been selected, the pilot is required to return to 1500' AGL (or depicted altitude) as soon as practicable.
WESA are intended to increase the pilot's options for selecting safe routes through areas of weather, terrain, or high traffic. When operating below 1500ft AGL the pilot should be vigilantly and constantly scanning for suitable landing areas.
2. Yellow Shoreline Areas - Weather Shoreline Safety Area (WSSA) - If flying through a transition area and the prescribed transition area altitude does not allow a safe transition for weather, traffic, or terrain, a pilot may maneuver into the WSSA (500ft AGL minimum) to continue a safe VFR transition but must return to the prescribed transition area altitude or 1500ft AGL if not depicted, as soon as practicable. The WSSA is depicted as the yellow area on the shoreline of every island and extends from the shoreline to 1 mile offshore.
3. Pink Areas – Congested Areas. 1500ft AGL minimum
4. Gray Areas – National Parks
5. Green with Black Outline Areas – Aircraft must remain 500ft above the lowest point within the KSSA (unless depicted as higher) or above the caution/warning/avoid area of the limiting height/velocity diagram (H/V curve). The PIC shall, at all times within a KSSA, have 500ft of cloud clearance above the aircraft regardless of the class of airspace. At all times in a KSSA the PIC must make a reasonable plan to operate the helicopter outside of the caution/warning/avoid area of the limiting height/velocity diagram (H/V curve).
 - KSSA will be listed by name and identified on each map.
 - Site specific training must be completed prior to conducting operation in this area.
6. Blue Textured areas – Transition Areas/Segments. Transition Areas/Segments. PIC will maintain 1500ft AGL unless otherwise depicted/written on the island Specific Map section. PIC can descend as low as 500ft AGL but must remain above the Height Velocity curve if unforeseen changing weather or traffic necessitates the descent. The pilot is required to return to 1500' AGL (or depicted altitude) as soon as practicable.
7. Red Lines – Accepted Razor Back Ridgelines – 200 ft AGL Minimum crossing at 45-degree angle. When crossing a RR the PIC shall, at all times, have 500ft of cloud clearance above the aircraft regardless of the class of airspace. It is not feasible for aircraft to continuously change altitude at each accepted razor back ridge. Therefore, it is understood that pilots will maintain the appropriate regulatory altitudes within Transition Areas/Segments or KSSA based on the prevailing altitude of that area and cross only accepted razor back sections at 200' ft AGL or above.
8. ATC Surface Areas - All altitudes will be as published or at the direction of ATC.

NOTE: It is understood that altitude transitions from one TA/S or KSSA to another cannot be immediate. Pilots will transition to published altitudes smoothly when they differ from one TA/S or KSSA to another.

Map 1 – Hawai'i



The island of Hawai'i has six (6) CATFP, ten (10) Transition Areas/Segments (TA/S), seven (7) Known Site specific Areas (KSSA), and four (4) Approved Razorback Ridgeline (RR) crossings.

NOTE: This map should be utilized to easily locate the WSSA, WESA, KSSA, Transition Areas/Segments and Razorback Ridgelines only. This map is not to be utilized for Navigational purposes.

CAUTION: Weather descriptions and CATFP in this section are based on “normal” trade wind flow. It must be recognized that winds from other directions will lead to at best different and at worst opposite weather conditions and opposite routing. Therefore, pilot risk assessments will have higher risk values when winds are other than trade winds (i.e. Kona winds).

CATFP - Descriptions are based on “normal” trade wind flow. The routing listed is general and can change based on winds, turbulence and weather patterns. Therefore, pilots may choose to only fly portions of a specific CATFP depending on what areas are available.

1. **Complete Hawai'i Island** - Departs from west side Hawai'i (i.e. KOA, Waikoloa Heliport) in a counterclockwise direction to AREA A and B, TA/S 2 and 3 or AREA G and C. Then KSSA 1 and/or 2. Then AREA D (may land for fuel at Hilo Airport), E,F, TA/S 4,8,1 and KSSA 4,5,6. End in AREA A.
2. **North Side Hawai'i Island** - Departs from west side Hawai'i (i.e. KOA, Waikoloa Heliport) in a clockwise direction to AREA A and F, TA/S 5 and 6 then AREA E and B, TA/S 8,3. Then AREA A. End in AREA A. This CATFP may be flown in reverse from the Hilo Airport
3. **Kohala Coast** - Departs from west side Hawai'i (i.e. KOA, Waikoloa Heliport) in a clockwise direction to AREA A and F, TA/S 5 and 6 then AREA E, TA/S 8. Then AREA A. End in AREA A.
4. **East Side Volcano** - Departs Hilo Airport and flies in a counterclockwise direction. Start in AREA D: TA/S 4,5 7 and 6, KSSA 3. Then TA/S 4,5,7,and 6, KSSA 4. End in AREA D: Hilo Airport.
5. **West Side Kona and South** - Departs Kona Airport. Start in AREA A, TA/S 2 and KSSA 1. Then South to AREA G, TA/S 9 and KSSA 7. End at Kona Airport.
6. **South Volcano** - Departs Kona Airport and begins in a counterclockwise direction. Start in AREA A: TA/S 9, KSSA 7. Next AREA G and C, TA/S 10, KSSA 2,3. Reverse back TA/S 10,9 End in AREA A: Kona Airport or continue AREA D: TA/S 4,5,6,7 End at Hilo Airport.

1: TA/S - 1: This area is used for transition to KSSA'S #5 and #6. Primarily leeward with open dry terrain, until crossing the wet line on Kohala to the NE. This area can be very windy and turbulent on strong tradewind days. Depending on the weather this transition allows for flight as far around as Upolu Point and entry into the Kohala Valleys from the back. Aircraft transitioning from the West side of the BI should be in a constant climb from 500 MSL after takeoff and be climbing to 3000 MSL if crossing at the water tanks, or 4000 MSL if crossing at riders, or 3500' MSL if entering the back valleys.

2: Used for transition from Kona or Waikoloa to the Saddle or Hualalai. Aircraft transitioning towards the saddle should be in a constant climb from 500 MSL after takeoff to cross HWY 190 at 3500 MSL and be climbing from 3500 MSL to 6500 MSL if flying towards the girl scout camp or climbing from 3500 MSL at HWY 190 to 5800 MSL if flying towards the center or south (1859 flow) side of the saddle. Aircraft transitioning towards Hualalai should be in a constant climb from 500 MSL after takeoff to 9000 MSL at the summit of Hualalai.

3: Encompasses the restricted area 3103 which can be flown through if coordinated with Bradshaw AAF and the range is cold. Weather on this transition can be obtained through a preflight briefing or in flight by PIREP observation or from Bradshaw AAF. Used to transition to or from Halemaumau Crater. Aircraft transitioning from west to east should be in a constant climb from the entry altitude and/or as instructed by ATC, to their destination altitude. If transitioning from east to west, altitudes should be in reverse and/or as instructed by ATC.

4,5,6,7: This transition is primarily for flights out of Hilo airport for aircraft to transition between Hilo and the Puu Oo vent. Due to the waves of windward weather that often approach this shoreline it will often be necessary to fly along the shoreline. This transition area has (a) and (b) corridors to account for different terrain. Aircraft flying west of Hwy 11 should be at 3000 MSL and if east of Hwy 11 2000 MSL. If using the Nelson corridor (which is east of Hwy 11) aircraft should be at 3000 MSL for noise abatement. TA/S (a) is a rural area with no homes and can be flown at a min of 800 MSL at the shoreline to a minimum of 3000 MSL at the north side of the Pu'u O'o vent remaining outside the national park. TA/S (b) is the NE portion of the east rift of Kilauea NE of Leilani estates and can be flown at a minimum of 800' MSL at the shoreline to 2000' MSL east of Leilani.

8: This transition area is for tour flights from the summit of Kilauea to the Hamakua Coast and to the Kohala Valleys. This profile should only be taken if weather allows transition around the eastern and northern facing slopes of Mauna Kea. Care must be taken to note how rapidly the weather is moving upslope on the east and north facing slopes of Mauna Kea. Weather can be obtained en-route from Hilo Airport or PIREP. Aircraft transitioning on the upper portion of the TA/S 5 should be at a min of 10,000' MSL down to a min of 800' MSL at the shoreline.

9: This transition is for tour flights heading south to Kealahou Bay. It also allows for access to the south and west sides of the Hualalai Volcano summit and for transition to and from TA/S 2.

10. This transition is for flights departing from Kona airport flying to the south primarily to KSSA #2 as an alternative profile to flying through the saddle. This is a conservative profile that may take longer and therefore has landings at both Kona and Hilo Airports.

KSSA – 1:Hualalai 2:Halemaumau, 3:Pu'u O'o, 4:Upper Falls, 5:Waimanu,Shoreline, and Interior (back) Valleys, 6:Honokane Valley, 7:Kealahou Bay:

AREA A: Consists primarily of open pastureland with some interspersed scrubs and low trees along with open lava flows. Area A borders from the Kona International Airport to Hapuna Heliport and runs to the boundary of the Pohakuloa Training Area. This area is leeward and typically has clear mornings and afternoon clouds, unless trade winds are strong.

AREA B: Consists primarily of open lava flows with sage scrub and sparse forest lands to the east and northeast. Area B covers the Pohakuloa Training Area (the saddle), northeastern rift zone of Mauna Loa from the 9000' elevation ENE to the summit of Kilauea. Weather within the saddle is typically clear, but clouds will often form on both east and west sides.

AREA C: Consists primarily of grasslands, forests and open lava flows. Area C starts along Highway 11, south of the Hawaii Volcanoes Observatory. From the observatory, this area extends down Hwy 11 to abeam the Pahala airstrip, and then SW to just south of Palima point. And ENE from the observatory, mauka of the east rift zone to the Pu'u O'o vent, and down to Kalapana. The southern part of this area tends to remain dry, but weather can build from the south with south winds or a sea breeze. The eastern portion of this area can be very wet, as it is exposed to trade wind weather.

AREA D: Consists of scattered agricultural land parcels, some rain forest and open pasture lands. Area D runs from Puu Oo vent to the Hilo Airport. There are large areas of rainforest, and many built up areas. This is the windward side of the island and therefore very susceptible to waves of low clouds and sometimes heavy rainfall.

AREA E: Almost entirely covered in rainforest as this is the windward side of the island. Since this is the windward side of the island it is very susceptible to waves of low clouds and sometimes heavy rainfall.

AREA F: Consists of open lava fields, intermittent patches of rainforest and pastureland. This is the leeward side of the island is very susceptible to high wind, high turbulence and rapidly changing weather in the mauka areas.

AREA G: Consists of open lava fields, intermittent patches of rainforest and pastureland. This is the leeward side of the island, and the NW portion of this area is usually sheltered from Trade Winds, while the SE portion of this area is more exposed to trade winds. A sea breeze usually develops in the afternoons, and clouds will develop in the mauka areas.

HAWAII KSSA 1-Hualalai

- Frequency: 127.05
- Entry and Exit Altitude: 1000 AGL Minimum Approximately 9000 MSL at the summit
- Ingress at 1000 AGL Minimum
- Egress at 1000 AGL minimum
- Ingress call will be “Present location, altitude, for Hualalai
- Egress call should be “Hualalai, altitude, for next destination
- Remarks-None



HAWAII KSSA 2 Halemaumau

Frequency: 122.850

Entry and Exit Altitude: 5000ft AGL Approximately 9000ft MSL (This will be 5000ft above the national park)

- Ingress from north at 5000ft AGL Approximately 9000ft MSL
- Egress to the north at 5000ft AGL Approximately 9000ft MSL
- Ingress call will vary depending on weather but should be, “present location (i.e. Kulani or East Rift Mauna Loa) for Kilauea Summit”
- Egress call should be, “Kilauea summit for next destination.”
- Remarks – Volcanic emissions can aid in the formation of weather, use caution. Flight through volcanic emissions shall be avoided.



HAWAII KSSA 3 Pu'u O'o Vent

Frequency: 122.850

Entry and Exit Altitude: 3400ft MSL.

At the vent: 2400ft MSL

- Ingress from east, south or north at 3400 MSL
- Egress is to the east, south or north at 3400 MSL
- Ingress call should be, “current location to the Vent”
- Egress call should be, “The vent to next destination.”
- Remarks –The Pu'u O'o vent area consists of new and old lava flows. The lava fields provide suitable forced landing areas. This area can become very congested at certain times. Limit of 2 aircraft circling the Pu'u O'o vent at one time. Pilots shall communicate with one another as to the directions of turns and make turns in the same direction. Volcanic emissions can aid in the formation of weather, use caution. Flight through volcanic emissions shall be avoided.



HAWAII KSSA 4 – Upper Falls

Frequency: Hilo Approach/Departure 119.7

Entry and Exit Altitude: 2500ft MSL.

At the falls: 1200ft MSL

- Ingress from east, 2500ft MSL, from the shoreline 2500ft MSL
- Egress to the east 2500 ft MSL, to the shoreline 2500ft MSL
- Ingress call should be, “current location to the Upper Falls”
- Egress call should be, “Upper Falls to next destination.”
- Remarks – If the upper falls are not available due to clouds or rain can show falls at Onomea offshore. Altitude will be at the direction of ATC.



HAWAII KSSA 5 – Waimanu and Shoreline to Honokane and Interior (back) Valleys

Frequency: Hawai'i Island tour CTAF 127.05

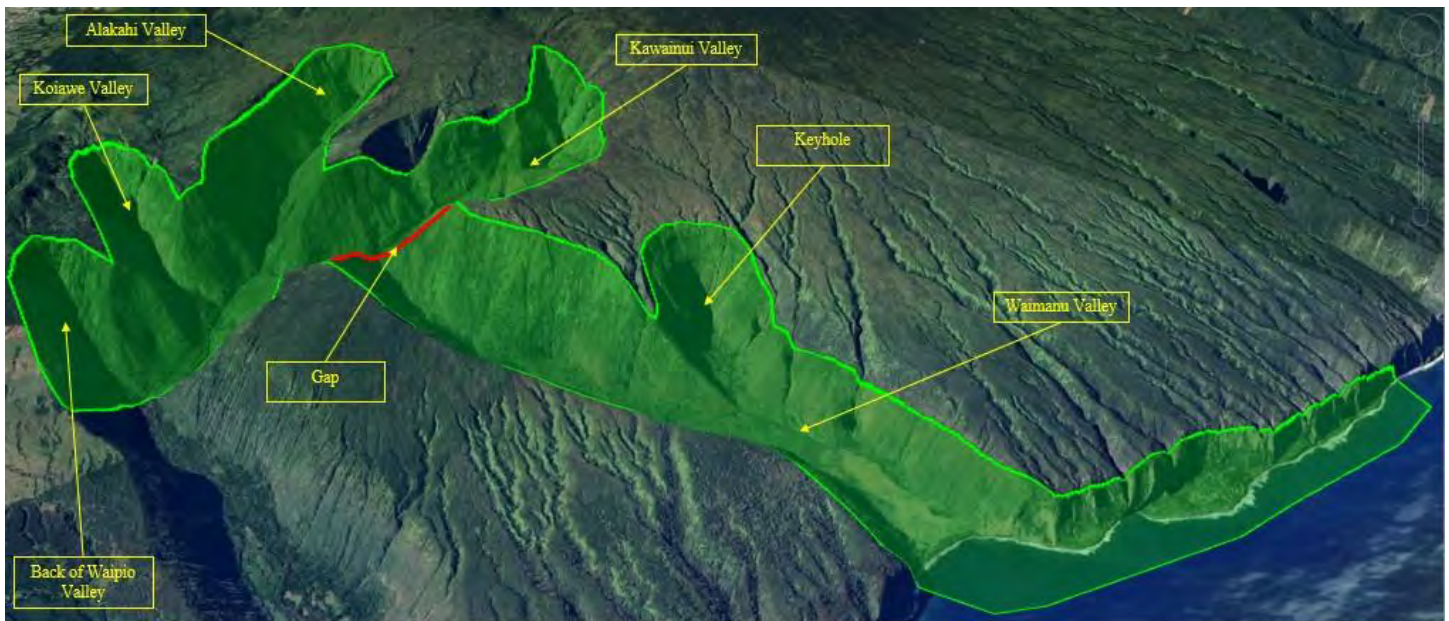
Entry and Exit Altitude: Min 500ft MSL.

At Waiilikahi Falls: 1000ft MSL

At the Keyhole: 1500ft MSL

Kawainui, Alakahi, Koiawe, Back of Waipio – 2200ft MSL

- Ingress into Waimanu from shoreline, Min 500ft MSL, Keyhole 1500ft MSL
- Egress from Waimanu to the shoreline Min 500ft MSL
- Cross the Gap approved Razorback Ridgeline at 2200ft MSL minimum
- Ingress call should be, “Shoreline for the Waiilikahi”, “Waiilikahi for the Keyhole”, “Keyhole for the Gap” “Gap for destination in interior valleys”
- Egress call should be, “Location in interior valleys for the gap,” “Gap for the shoreline,” “Keyhole for the shoreline” “Waiilikahi for the shoreline”
- Remarks – Required position report if transitioning through the gap, “Gap for... (Intended destination)” Entry into the interior valleys will typically be from Waimanu beach but can also be from the back into Alakahi or Kawainui, Koiawe is seldom used but can be. Weather (clouds) will often fill in south of the gap. A transition from Waimanu through the gap into Kawainui should only be made if the weather is known to be good in the back valleys, use caution. The valley floors provide suitable forced landing areas. Ingress and Egress can be from any direction.



HAWAII KSSA 6- Honokane Valley

Frequency: Hawai'i Island tour CTAF 127.05

Entry and Exit Altitude: Min 500ft MSL at the shoreline into Honokane

Back of valleys: 3000 ft MSL East and West Branch

Entry into back of valley from 4500ft MSL descending to 3000ft MSL

- Ingress into Honokane from shoreline, Min 500ft MSL
- Egress from Honokane to the shoreline Min 500ft MSL
- Ingress call should be, "Shoreline for Honokane"
- Egress call should be, "Back of Honokane for the Shoreline or Riders or Top of Kohala,"

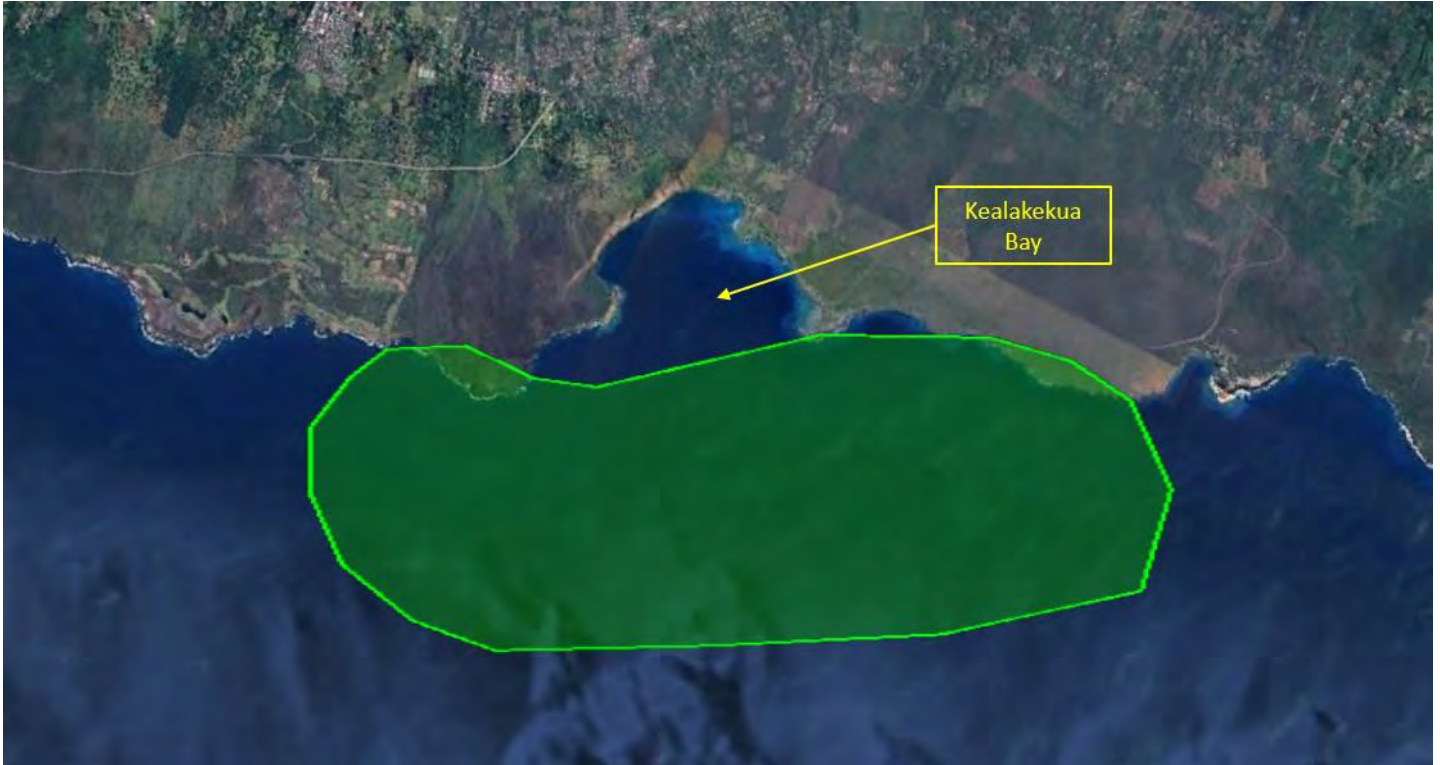


HAWAII KSSA 7- Kealakekua Bay

Frequency: Hawai'i Island tour CTAF 127.05

Entry and Exit Altitude: Between 800 ft MSL to 1500ft MSL over the water.

- Ingress from the North along the shoreline southbound
- Egress from the south along the coastline northbound
- Ingress call should be “Entering Kealakekua or Captain Cook Bay for turns”
- Egress call should be Exiting Kealakekua or Captain Cook Bay Northbound



Revision Number – Draft

Effective Date – 00/00/00

The islands of Maui, Molokai and Lanai have three (3) CATFP, six (6) Transition Areas/Segments (TA/S), fifteen (15) Known Site specific Areas (KSSA), and eight (8) Approved Razorback Ridgeline (RR) crossings.

NOTE: This map should be utilized to easily locate the WSSA, WESA, KSSA, Transition Areas/Segments and Razorback Ridgelines only. This map is not to be utilized for Navigational purposes.

CAUTION: Weather descriptions and CATFP in this section are based on “normal” trade wind flow. It must be recognized that winds from other directions will lead to at best different and at worst opposite weather conditions and opposite routing. Therefore, pilot risk assessments will have higher risk values when winds are other than trade winds (i.e. Kona winds).

CATFP - Descriptions are based on “normal” trade wind flow. The routing listed is general and can change based on winds, turbulence and weather patterns. Therefore, pilots may choose to only fly portions of a specific CATFP depending on what areas are available.

- 1 **West Maui, Molokai and Lanai** - Departs Kahului Airport and flies in a counterclockwise direction. Start in AREA A: OGG, TA/S 1, Maui KSSA 1 and 2, Molokai KSSA 1,2 and 3. Then AREA C: TA/S 2 and 3, Maui KSSA 3,4,5,6 and 7. End in AREA D: OGG.
- 2 **Complete Island Maui** - Departs Kahului Airport and flies in counterclockwise direction. Start in AREA A: OGG, TA/S 1, Maui KSSA 1 and 2. Then AREA C: TA/S 2 and 3, Maui KSSA 3,4,5,6 and 7. Next AREA D and F: TA/S 4,5 and 6, Maui KSSA 9,10,11, and 12. End in AREA D: OGG
- 3 **East Maui** - Departs Kahului Airport and flies in a clockwise direction. Start in AREA F: TA/S 4,5 and 6, Maui KSSA 9,10,11 and 12. End in AREA D: OGG

TA/S – 1:OGG to Maui KSSA 1 and 2 to Molokai KSSA 1,2 and 3. 800 ft MSL- 1500 ft MSL to avoid fixed wing traffic inbound to OGG, over channels between Maui, Molokai and Lanai, and on Molokai’s north shore.

2:Transition of over ocean channels between Maui, Molokai and Lanai. 800 ft MSL- 1500 ft MSL to avoid fixed wing traffic inbound to OGG, over channels between Maui, Molokai and Lanai, and on Molokai’s north shore.

3:Transition from midfield Kapalua Airport at 2000ft MSL climbing to 2500ft MSL mauka of Lahaina town but Makai the “Big L” to the front of Launiupoko Valley.

4:OGG to Hana shoreline. Transition to Maui KSSA 9,10,11 and 12. 800 ft MSL- 1500 ft MSL to avoid fixed wing traffic inbound to OGG, and along Maui’s north shore.

5:Mauka Transition from Maui KSSA 10 to Maui KSSA 11. 2300ft MSL Minimum.

6: Mauka Transition from Maui KSSA 11 or 12 to OGG. At or above 2500ft MSL departing Maui KSSA 11 or 12 with steady climb to at or above 4000ft MSL over Makawao then descend as directed by OGG TWR.

Maui KSSA – 1: Waihee Valley, 2:Honokohau Valley, 3:Launiupoko Valley, 4: Olowalu Valley, 5: Iao Valley, 6: Waikapu Valley, 7: Ukumehame Valley, 8: Manawainui Canyon, 9: Waihiu Falls, 10: Waihoi Valley, 11: Kano and Koolau Falls, 12: Honomanu Valley.

Molokai KSSA - 1: Papalaua, 2:Wailau Valley, 3:Pelekunu Valley.

Lanai KSSA - None

AREA A: Is primarily the north shore and windward sides of West Maui and East Molokai. There is drastic mountainous terrain and it is covered in rain forest. These areas receive high amounts of rainfall. This is one of the areas that pilots will most likely experience lower clouds and reduced visibility.

AREA B: This is the leeward side of east Molokai. It's very dry and mountainous. Although clouds will tend to stay higher and there is little rainfall, this area can be very turbulent and should be avoided on tours.

AREA C: Consists of areas around the west side of West Maui. The Mauka areas are primarily agricultural areas interspersed with shrubs and low trees. This area tends to be dry and free of rainfall. It does not get very turbulent.

AREA D: Consists primarily of agricultural fields with some interspersed scrub and low trees along with open lava flows in the southern portion. Winds can be very high through this central valley and there will be turbulence in the southwestern portion of this area near McGregor Point. Area D borders from the Kahului International Airport to La Peruse Bay and runs up Haleakala to the developed areas.

AREA E: This is leeward east Maui and has a dry desert climate. A large cloud shelf will build over this area, but clouds and turbulence tend not to be present until approaching the boundaries of AREA F.

AREA F: Is primarily the north shore and windward side of East Maui. There is drastic mountainous terrain, and it is covered in rain forest. These areas receive high amounts of rainfall. This is one of the areas that pilots will most likely experience lower clouds and reduced visibility.

MAUI KSSA 1 – Waihee Valley

Frequency: 120.650

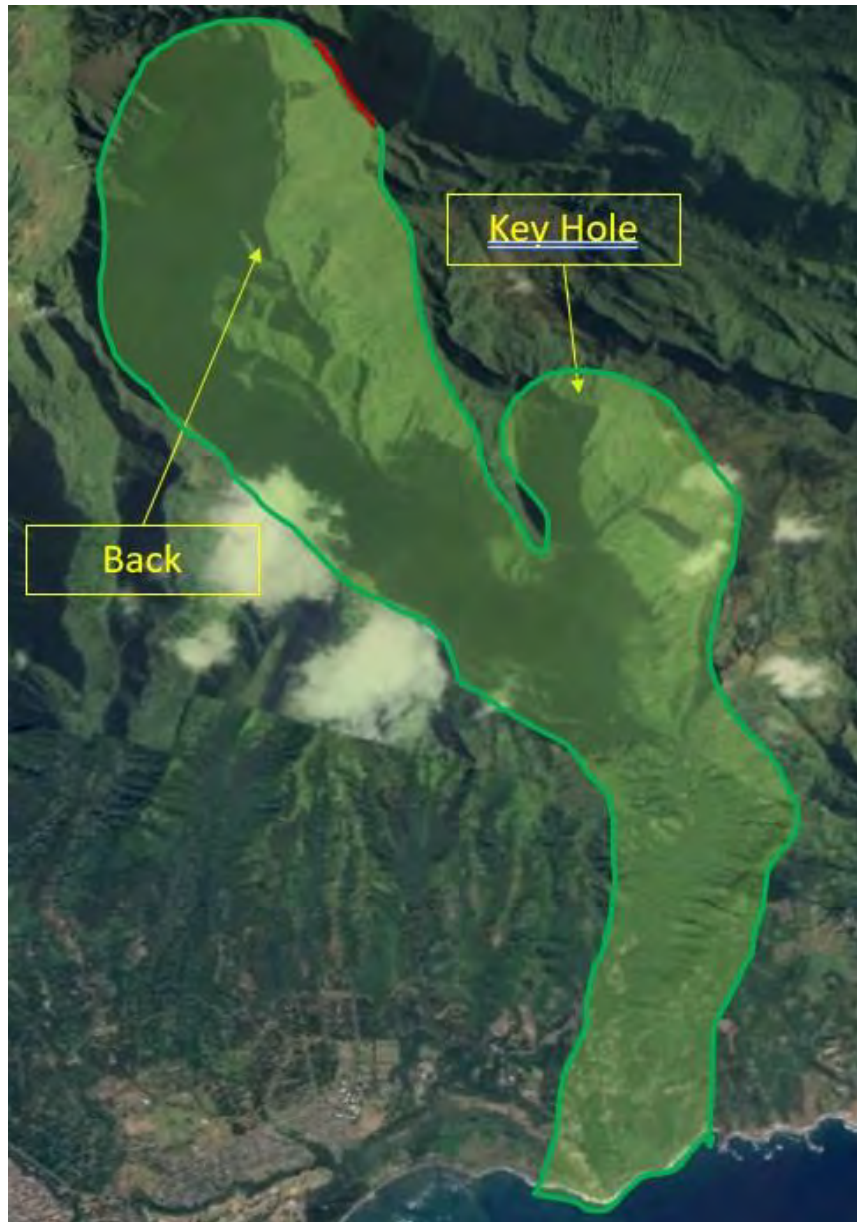
Entry 2000ft MSL Shoreline to the Keyhole at or above 2000ft MSL - Opposite for exit to shoreline
Call “Waihee Shoreline for the Keyhole” or "Waihee Shoreline for the back” - Opposite on way out.

2000ft MSL at Keyhole climbing to at or above 2500ft MSL at the back of Waihee Valley.
Call “Keyhole for the back” - Opposite on the way out.

Can cross RR into Honokohau at or above 4700ft MSL. Call “Back of Waihee crossing into Honokohau.”

Turns at Keyhole at or above 2000ft MSL minimum, turns at back of valley at or above 2500ft MSL minimum

Low point of back of Keyhole is approximately 800ft MSL, Low point of back of Valley approximately 1600ft MSL.



MAUI KSSA 2 – Honokohau Valley

Frequency: 120.650

Entry at or above 1500ft MSL Shoreline climbing to the Jurassic Falls at or above 2000ft MSL - Opposite for exit to shoreline

Call “Honokohau Shoreline for Jurassic” or “Honokohau Shoreline for the back” - Opposite on way out.

At or above 2000ft MSL at Jurassic climbing to at or above 3000ft MSL at the back of Honokohau Valley.

Call “Jurassic for the back” - Opposite on the way out

Can cross RR into Waihee at or above 4700ft MSL. Call “Back of Honokohau crossing into Waihee.”

Turns at Jurassic Falls at or above 2000ft MSL minimum

Turns at back of Valley or above 3000ft MSL minimum

Low point of Jurassic Falls is approximately 800ft MSL, Low point of back of Valley approximately 2000ft MSL.



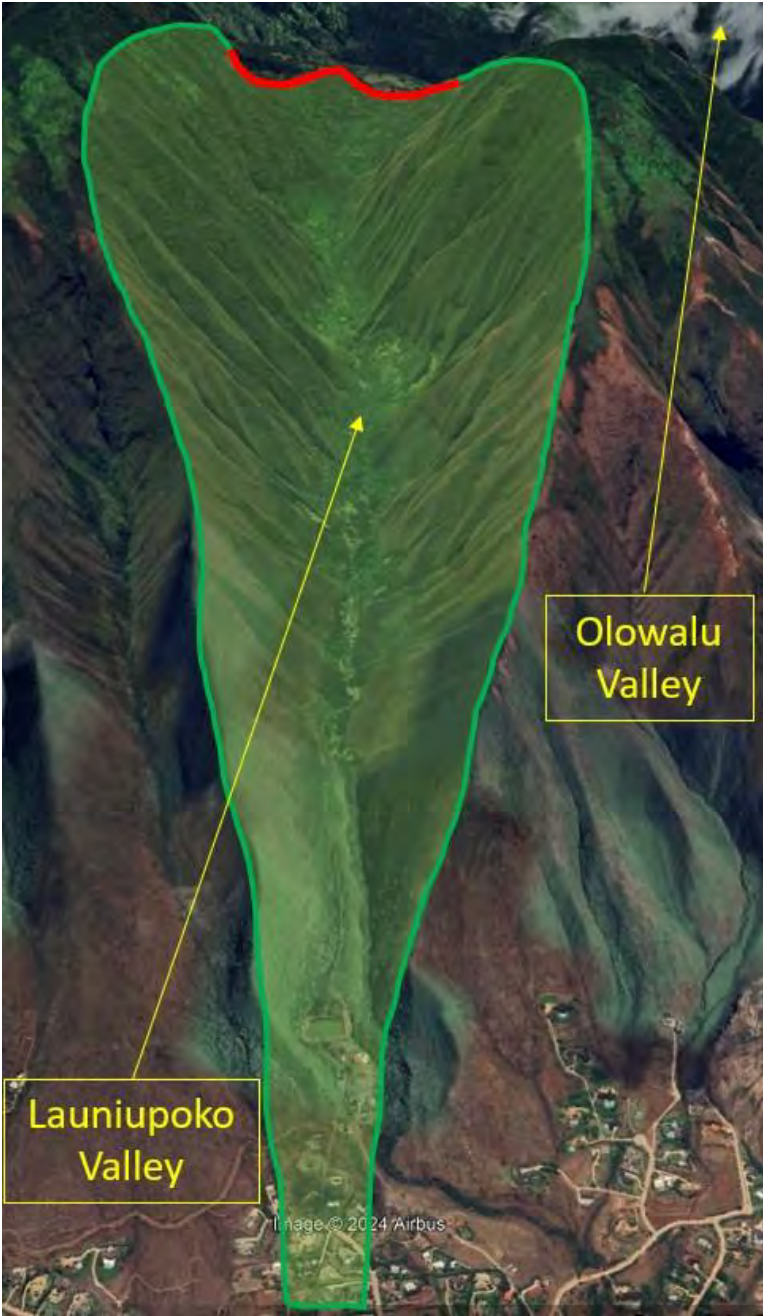
MAUI KSSA 3 – Launiupoko Valley
Frequency: 120.650

No turns in Launiupoko unless to turn around if RR crossing is not available.

Entry at or above 1500ft MSL Shoreline to RR crossing at or above 3000ft MSL
Call “Launiupoko Shoreline for the back”

Entry from TA/3 at or above 2000ft MSL
Call “Front door Launiupoko for the back.”

Can cross RR into Olowalu at or above 3000ft MSL. Call “Back of Launiupoko crossing into Olowalu.”



MAUI KSSA 4 – Olowalu Valley

Frequency: 120.650

Entry 1500ft MSL Shoreline to RR crossing into Iao Valley at 3400ft MSL or RR crossing into Ukumehame Valley at or above 3400ft MSL.

Call “Launiupoko Shoreline for the back”

Entry from Launiupoko RR at or above 3000ft MSL to Iao RR at or above 3400ft MSL or Ukumehame RR at or above 3200ft MSL.

Call “Back of Launiupoko across Olowalu for Iao” or “Back of Launiupoko across Olowalu for Ukumehame.”

Entry from Launiupoko RR at or above 3000ft MSL descending to Shoreline Olowalu at or above 1500ft MSL.

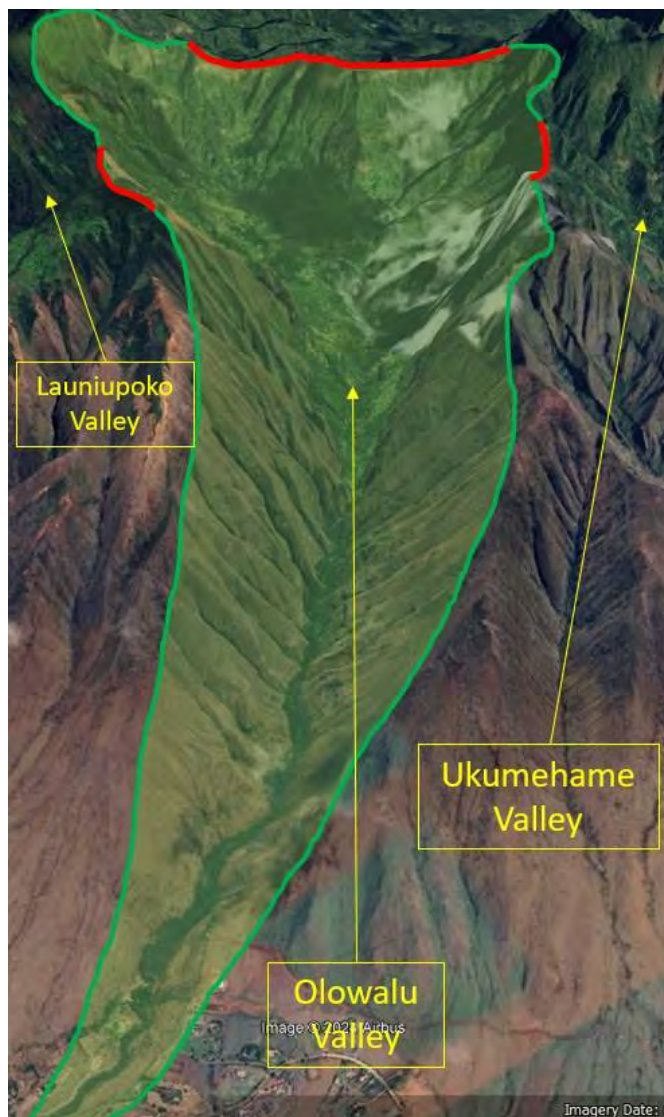
Call “Back of Launiupoko for Shoreline Olowalu.”

Entry from Ukumehame RR at or above 3200ft MSL to Iao RR at or above 3400ft MSL or Olowalu Shoreline.

Call “Back of Ukumehame across Olowalu for Iao” or “Back of Ukumehame for Shoreline Olowalu.”

Turns in Valley at or above 2500ft MSL

Low point of valley approximately 1500ft MSL.



MAUI KSSA 5 – Iao Valley

Frequency: 120.650

Entry from front of Valley at or above 2500ft MSL climbing to RR crossing into Olowalu Valley at or above 3400ft MSL
Call “Front of Iao for the back”

Entry from Olowalu RR at or above 3400ft MSL to Waikapu RR at or above 3200ft MSL or Olowalu RR at or above 3400ft MSL to Front of Valley at or above 2500ft MSL.

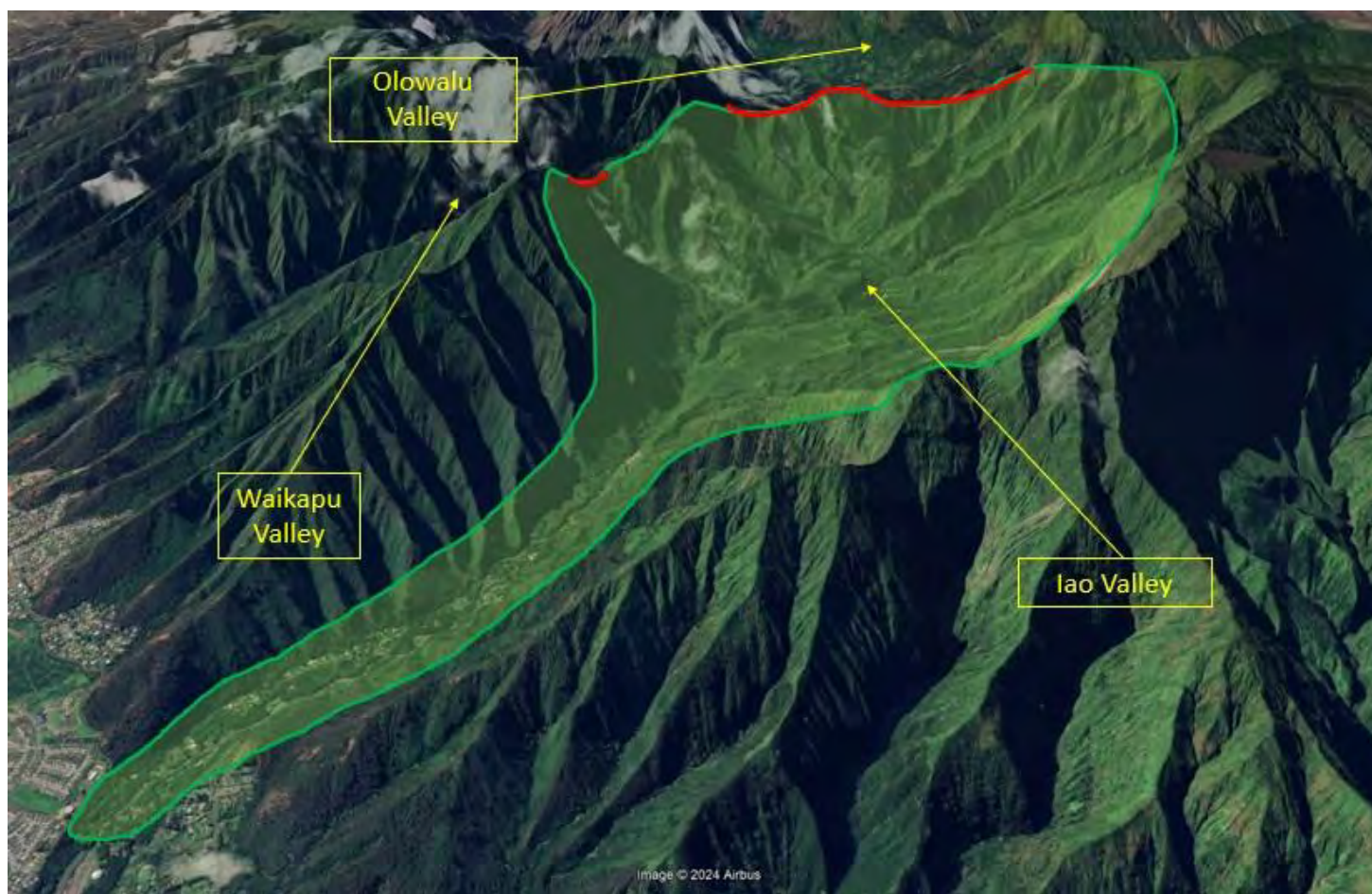
Call “Back of Iao for Waikapu” or “Back of Iao for the front.”

Entry from Waikapu RR at or above 3200ft MSL to Iao RR at or above 3400ft MSL

Call “Back of Waikapu for Back of Iao”

Turns in valley at or above 2500ft MSL minimum

Low point of Valley approximately 1500ft MSL



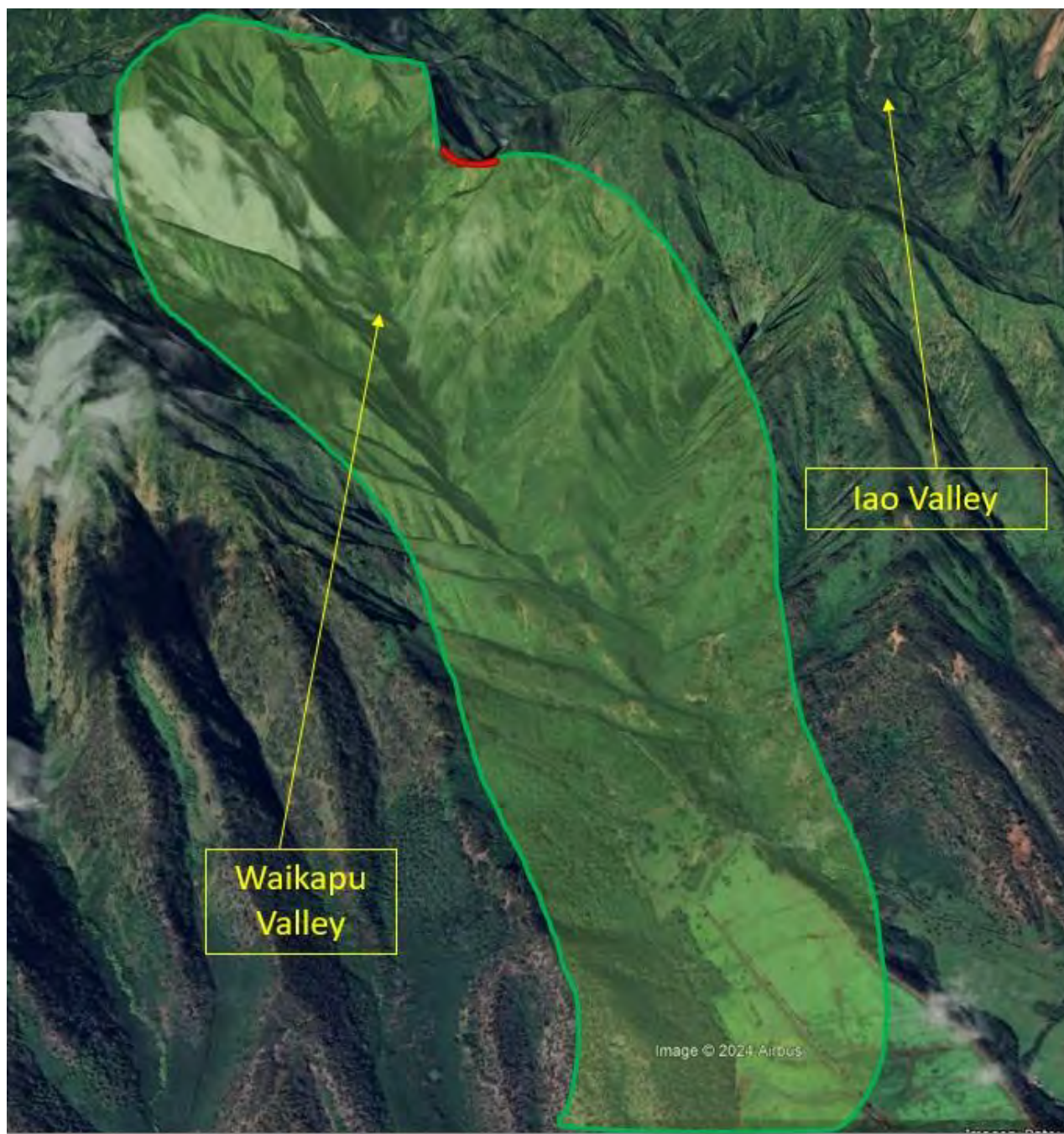
MAUI KSSA 6 – Waikapu Valley

Frequency: 120.650

No Turns in Waikapu Valley

Entry from front of Valley at or above 2000ft MSL climbing to RR crossing into Iao Valley at or above 3200ft MSL
Call “Front of Waikapu for the back”

Entry from Iao RR at or above 3200ft MSL to front of Waikapu at or above 2000ft MSL
Call “Back of Waikapu for the front.”



MAUI KSSA 7 – Ukumehame Valley

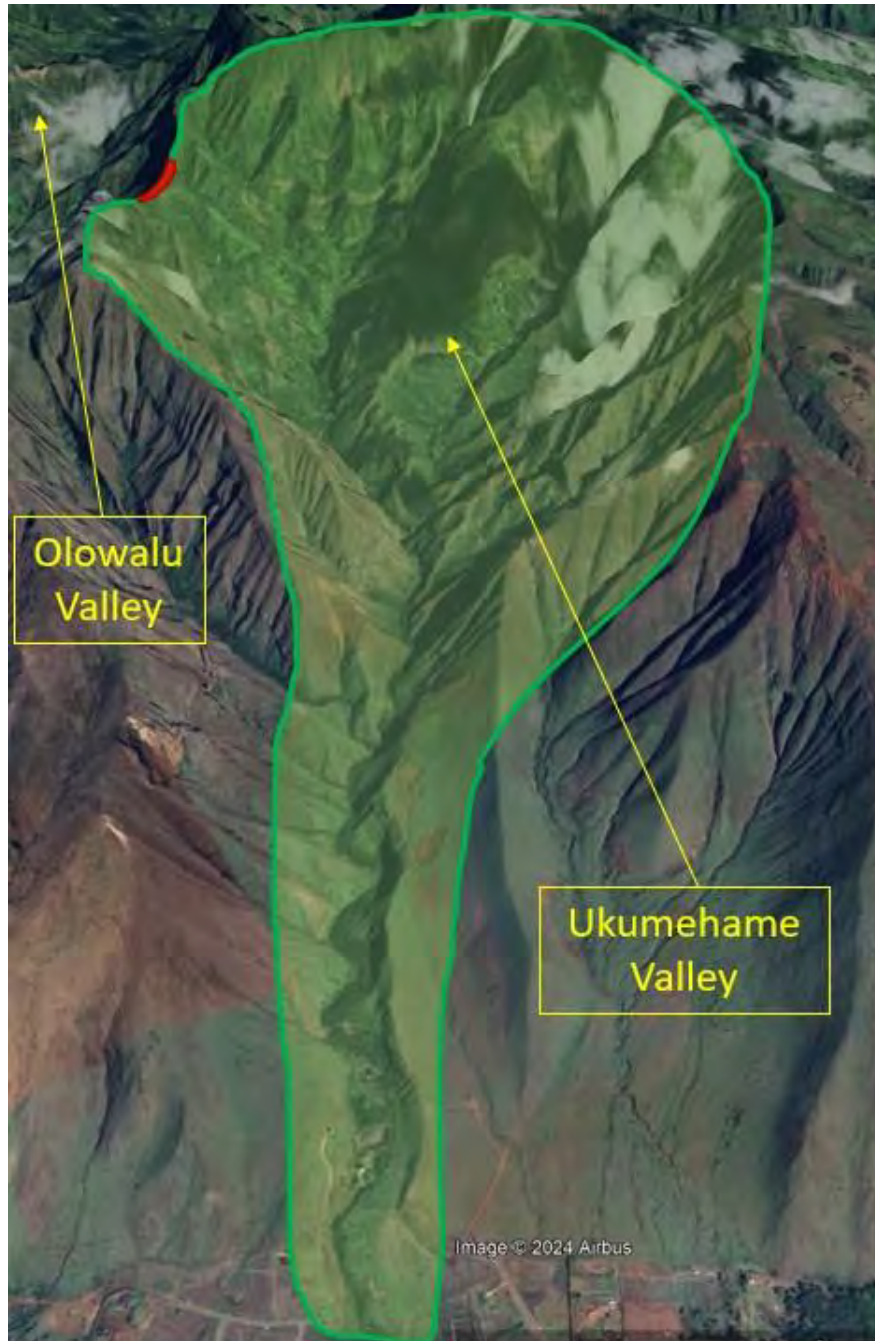
Frequency: 120.650

Entry from shoreline at or above 1500ft MSL climbing to RR crossing into Olowalu Valley at or above 3200ft MSL
Call “Front of Ukumehame for the back”

Entry from Olowalu RR at or above 3200ft MSL to Shoreline at or above 1500ft MSL
Call “Back of Ukumehame for the shoreline.”

Turns in valley at 2500ft MSL

Low point of Valley approximately 1500ft MSL



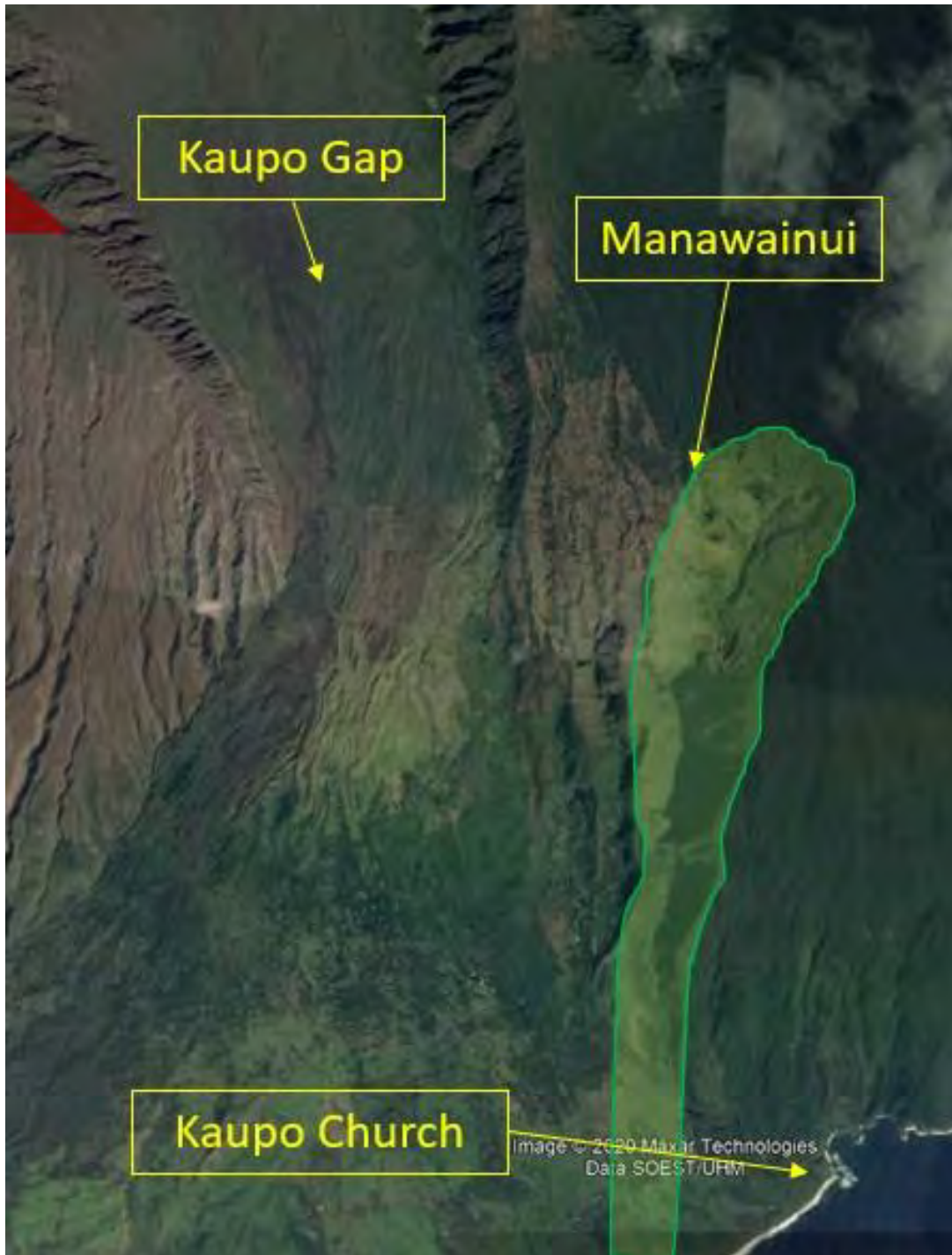
MAUI KSSA 8 – Manawainui Canyon

Frequency: 120.650

Entry from shoreline at or above 1500ft MSL climbing to the back at or above 4000ft MSL (2200ft AGL)
Call “Front of Manawainui for the back.”

Turns in canyon at or above 4000ft MSL

Low point of Valley approximately 1800ft MSL



MAUI KSSA 9 – Waihiūmalu Falls

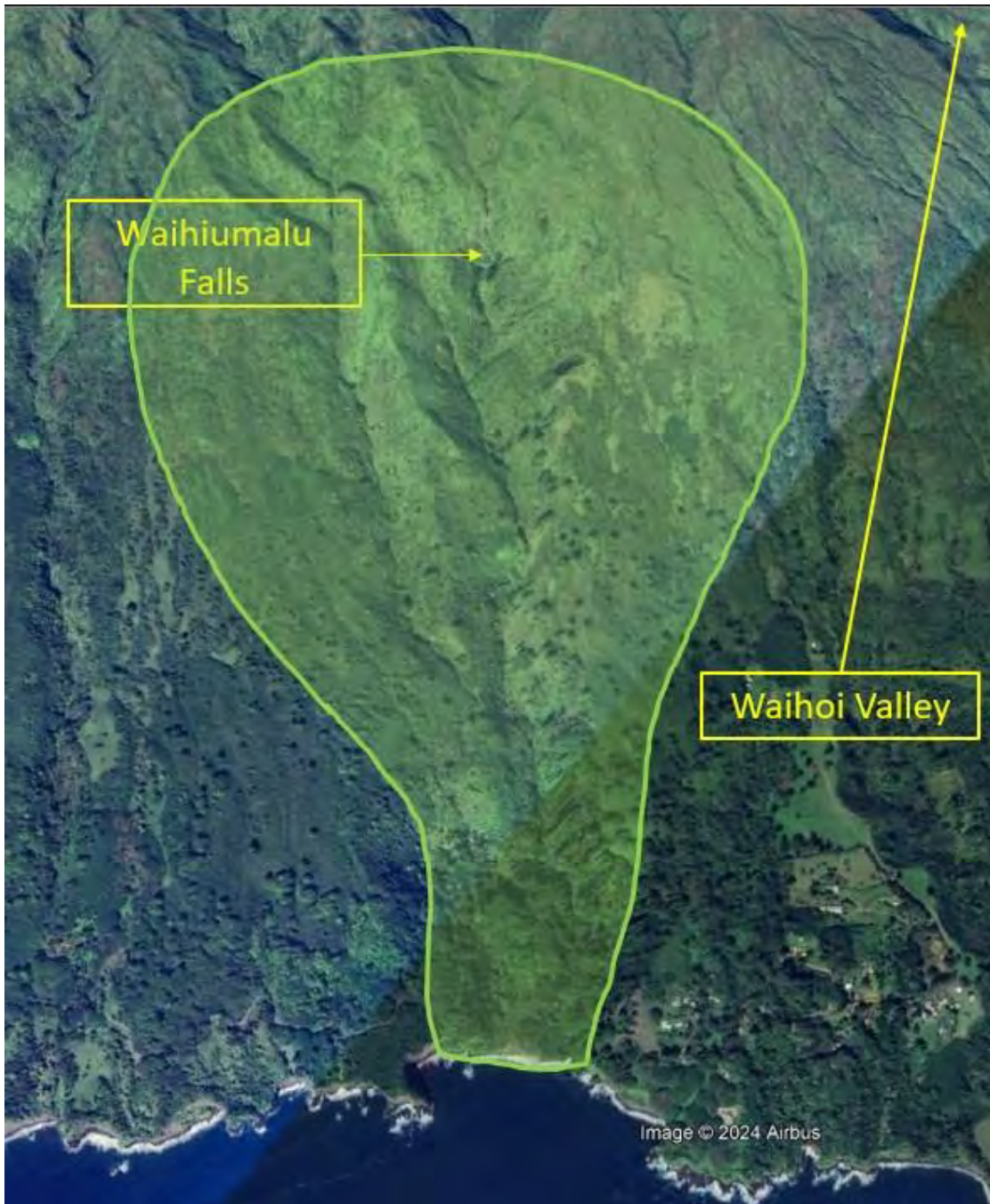
Frequency: 120.650

Entry from shoreline at or above 1500ft MSL climbing to the falls at or above 2000ft MSL
Call “Shoreline Waihiūmalu for the falls” - Opposite for back to shoreline.

Exit to Waihoi Valley at or above 2000ft MSL climbing to Waihoi at or above 2800ft MSL
Call “Waihiūmalu for Waihoi.”

Turns at or above 2000ft MSL minimum

Low point of KSSA 9 approximately 1000ft MSL



MAUI KSSA 10 – Waihoi Valley

Frequency: 120.650

Entry from Waihiimalu at or above 2800ft MSL climbing to the back at or above 3500ft MSL
Call “Front of Waihoi for the back.”

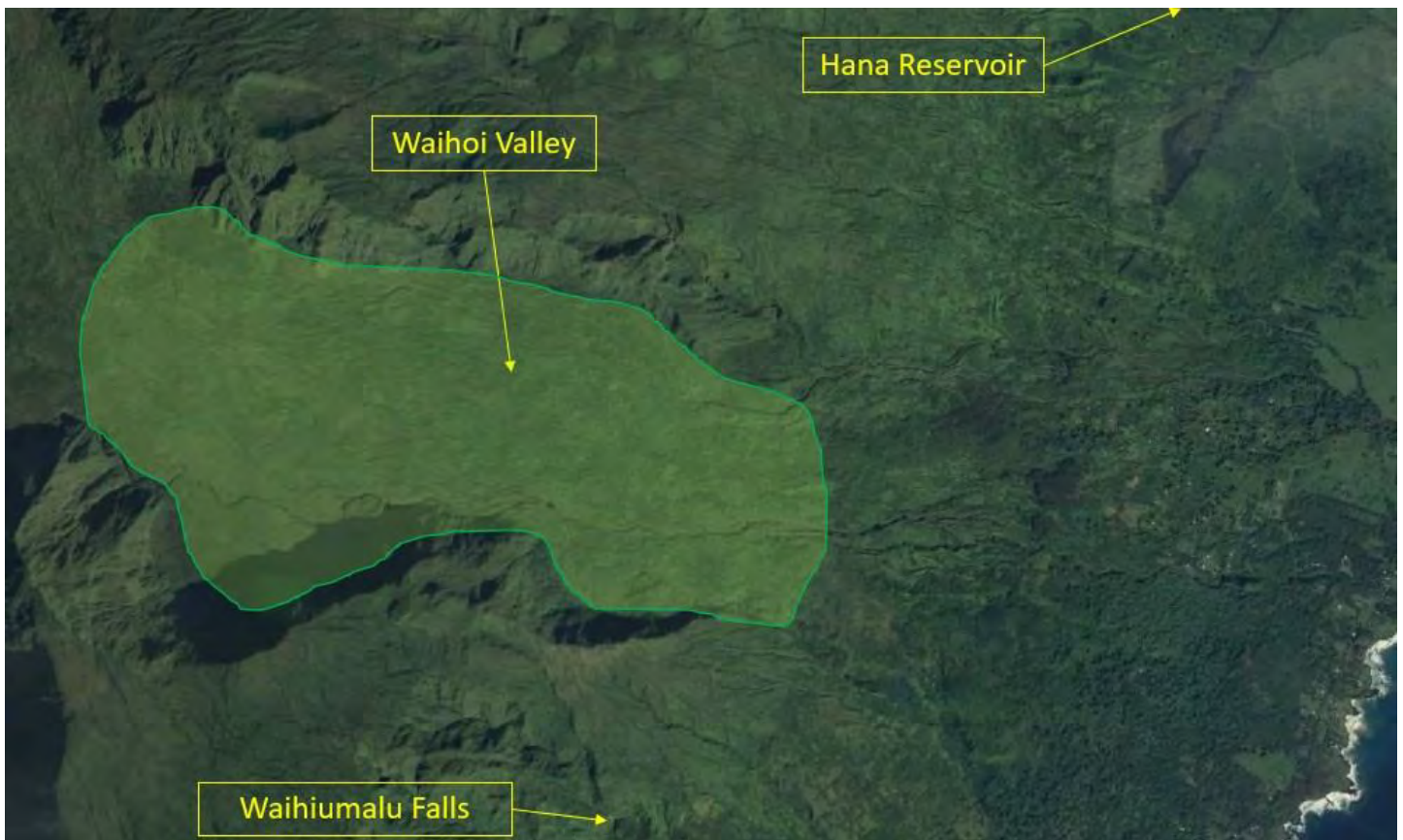
Entry from TA/S 5 at or above 2800ft MSL climbing to the back at or above 3500ft MSL
Call “Front of Waihoi for the back.”

Exit to Waihiimalu at or above 2800ft MSL descending to or above 2000ft MSL at the falls.
Call “Waihoi for Waihiimalu.”

Exit to TA/S 5 at or above 2800ft MSL descending to at or above 2300ft MSL to KSSA 11 Kano and Koolau Falls.
Call “Waihoi for Mauka to Kano.”

Turns in back of valley at or above 3500ft MSL

Low point of Valley approximately 2700ft MSL



Revision Number – Draft

Effective Date – 00/00/00

MAUI KSSA 11 – Kano and Koolau Falls

Frequency: 120.650

Low point at Kano approximately 1000ft MSL, Low point at Koolau approximately 2500ft MSL

Entry from TA/S 5 at or above 2300ft MSL to Kano Falls at or above 2000ft MSL

Call “Wailuas for Kano Falls.”

Entry from TA/S 4 shoreline at or above 1500ft MSL to Kano Falls at or above 2000ft MSL

Call “Shoreline to the box and Kano Falls.”

Entry from KSSA 12 Honomanu over RR at or above 2300ft MSL to Kano Falls at or above 2000ft MSL.

Call “Back of Honomanu for Kano Falls.”

Entry from TA/S 6 at or above 4000ft MSL at Makawao descending to the back of Honomanu at or above 2000ft MSL or Kano falls at or above 2000ft MSL

Call “Makawao for Honomanu” or “Makawao for Kano Falls.”

Transition from Kano Falls at or above 2000ft MSL to Koolau Falls at or above 3000ft MSL

Call “Kano to Koolau Falls.”

Exit to TA/S 6 at or above 2500ft MSL climbing to at or above 4000ft MSL over Makawao.

Call “Kano for Makawao.”

Exit to KSSA 12 Honomanu over RR at 2300ft MSL to back of Honomanu at or above 2000ft MSL

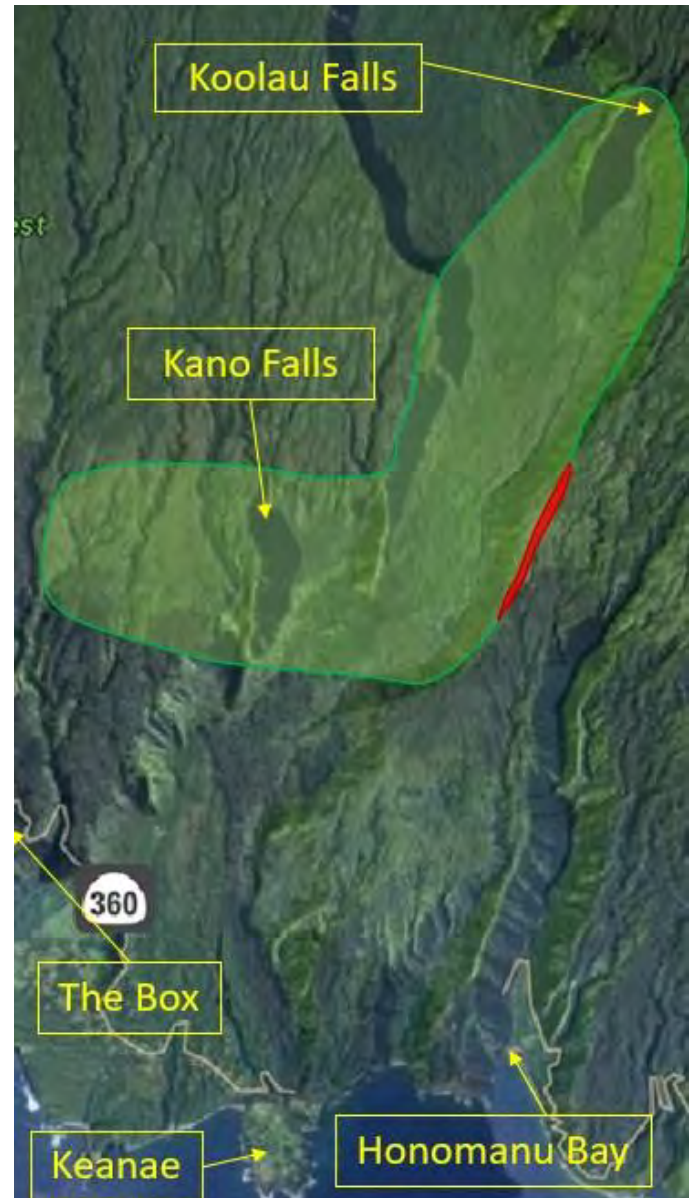
Call “Kano for the back of Honomanu.”

Exit to TA/S 4 Kano Falls at or above 2300ft MSL to shoreline at or above 1500ft MSL.

Call “Kano Falls to the shoreline.”

Exit to TA/S 5 Kano Falls at or above 2300ft MSL to the cones and the Waihoi at or above 2800ft MSL.

Turns at Kano falls at or above 2000ft MSL, Turns at Koolau Falls at or above 3000ft MSL



MAUI KSSA 12 – Honomanu Valley

Frequency: 120.650

Entry from KSSA 11 over RR at or above 2300ft MSL to the back of valley at or above 2000ft MSL
Call “Kano for the back of Honomanu.”

Entry from Shoreline at or above 1500ft MSL climbing to the back at or above 2000ft MSL (1500ft AGL)
Call “Shoreline Honomanu for the back.”

Entry from TA/S 6 at or above 4000ft MSL over Makawao descending to the back of Honomanu at or above 2000ft MSL
Call “Makawao for back of Honomanu.”

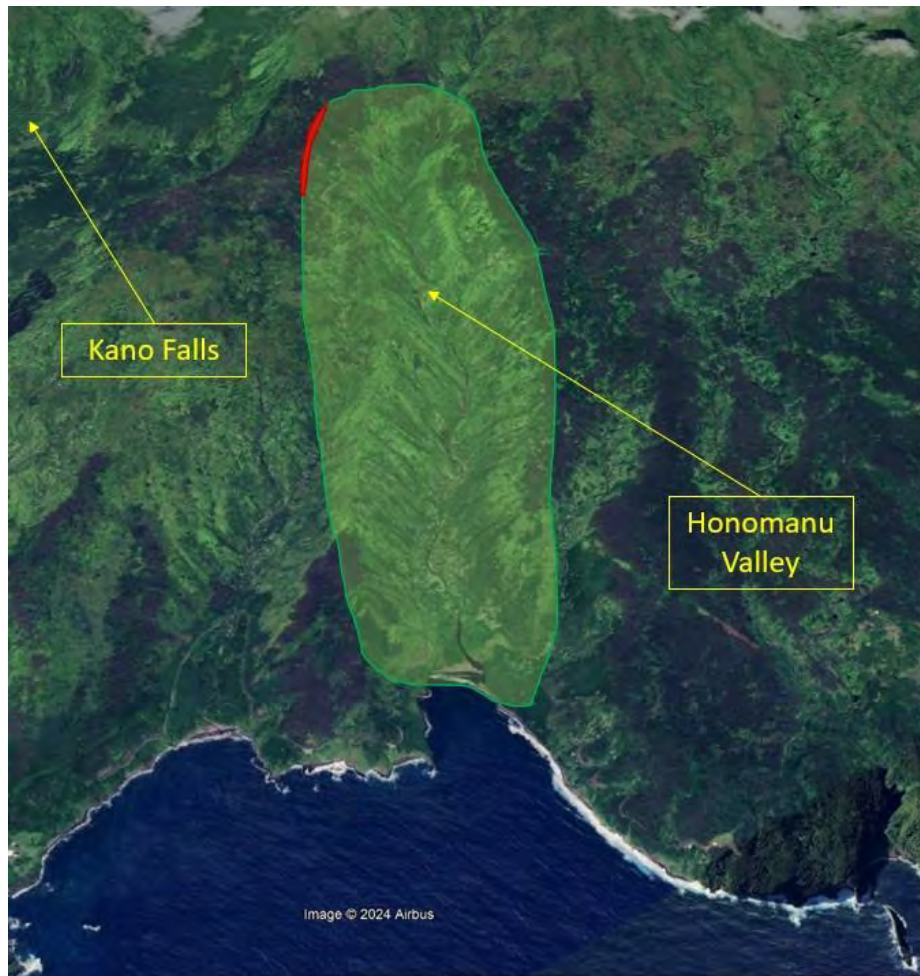
Exit to TS/A 6 at or above 2500ft MSL climbing to at or above 4000ft MSL over Makawao.
Call “Back of Honomanu for Makawao.”

Exit to Kano over RR at or above 2300ft MSL to or above 2000ft MSL at Kano Falls
Call “Back of Honomanu for Kano Falls.”

Exit to Shoreline at or above 2000ft MSL at the back descending to or above 1500ft MSL at the shoreline.
Call “Back of Honomanu for the Shoreline.”

Turns in valley at or above 2000ft MSL.

Low point of Valley approximately 1000ft MSL



Molokai KSSA 1 – Papalaua Falls

Frequency: 121.950

One aircraft at a time, no stacking.

Entry from shoreline at or above 1200ft MSL heading to the falls at or above 1500ft MSL
Call “Shoreline Papalaua for the falls” - Opposite for back to shoreline.

Exit to TA/S 1 at or above 1200ft MSL
Call “Papalaua for Wailau.” or “Papalaua for Halawa”

Turns at or above 1200ft MSL

Low point of KSSA approximately 500ft MSL.



Molokai KSSA 2 and 3 – Wailau and Pelekunu Valleys

Frequency: 121.950

Entry into Wailau from the shoreline at or above 1500ft MSL climbing to RR at the back of Wailau at or above 3000ft MSL to Pukoo
Call “Shoreline Wailau for the back”

Entry into Wailau from RR at the back of Pelekunu at or above 3200ft MSL to RR at or above 3000ft MSL at the back of Wailau or to shoreline at or above 1500ft MSL of Wailau.

Call “Back of Pelekunu for back of Wailau” or “Back of Pelekunu for the Shoreline Wailau.”

Exit Wailau over RR at back of Wailau at or above 3000ft MSL or RR at back of Pelekunu at or above 3200ft MSL

Call “Back of Wailau for Pukoo” or “Wailau into Pelekunu.”

Exit Wailau at the shoreline at or above 1500ft MSL from the back of Wailau

Call “Back of Wailau for the shoreline”

Turns in Wailau at 2000ft MSL.

Low point of Wailau 1000ft MSL.

Entry into Pelekunu from the shoreline at or above 1500ft MSL climbing to RR at the back of Pelekunu at or above 3200ft MSL

Call “Shoreline Pelekunu for the back”

Entry into Pelekunu from RR in Wailau at or above 3200ft MSL.

Call “Wailau into Pelekunu.”

Exit Pelekunu over RR at the back of Pelekunu at or above 3200ft MSL.

Call “Back of Pelekunu into Wailau”

Exit Pelekunu to the shoreline at or above 1500ft MSL from the back of Pelekunu

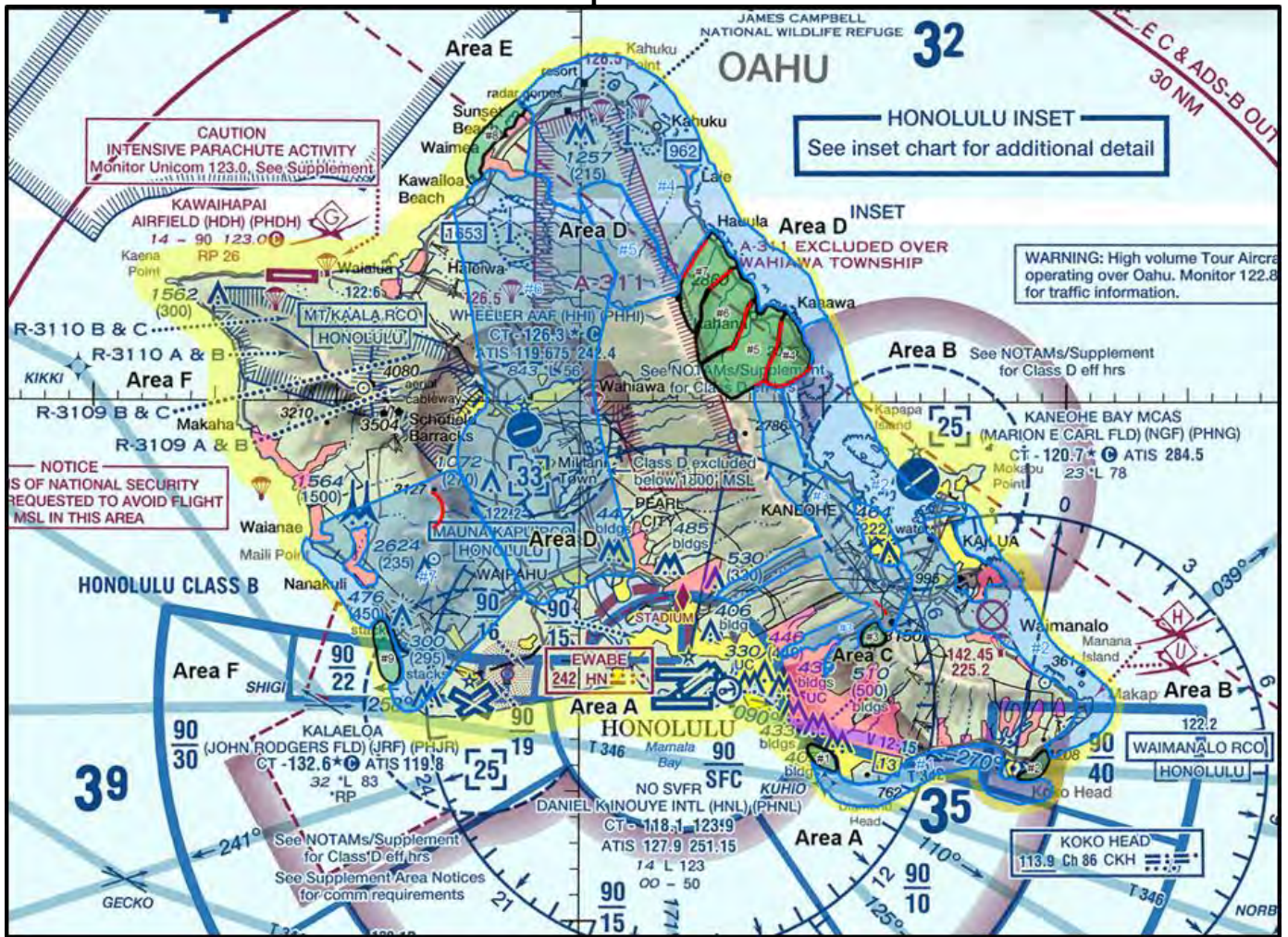
Call “Back of Pelekunu for the shoreline.”

Turns in Pelekunu at 2500ft MSL

Low point of Pelekunu 1600ft MSL.



Map 3 - Oahu



The island of Oahu has (5) CATFP, seven (7) Transition Areas/Segments (TAS), nine (9) Known Site specific Areas (KSSA), and 8 Accepted Razorback Ridgelines (RR).

NOTE: This map should be utilized to easily locate the WSSA, WESA, KSSA, Transition Areas/Segments and Razorback Ridgelines only. This map is not to be utilized for Navigational purposes.

CAUTION: Weather descriptions in this section are based on “normal” trade wind flow. It must be recognized that winds from other directions will lead to at best different and at worst opposite weather conditions. Therefore, it is recommended that pilot risk assessments include higher risk values when winds are other trade winds (i.e. Kona winds).

CATFP: Descriptions are based on “normal” trade wind flow. The routing listed is general and can change based on winds, turbulence and weather patterns. Therefore, pilots may choose to only fly portions of a specific CATFP depending on what areas are available.

- 1 **South Shore Oahu** - Departs Honolulu Airport and flies in a counterclockwise direction. Start in AREA A: HNL, Oahu KSSA 1, TA/S 1, and reverse course to End in Area A: HNL.
- 2 **East Side, Pali Oahu** - Departs Honolulu Airport and flies in counterclockwise direction. Start in AREA A: HNL, Oahu KSSA 1, TA/S 1. Next AREA B: Oahu KSSA 2, TA/2. Then Area C: TA/S 3 and Oahu KSSA 3. End in Area A: HNL.

- 3 **East Side, Ko'olau's Oahu** -Departs Honolulu Airport and flies in counterclockwise direction. Start in AREA A: HNL, Oahu KSSA 1, TA/S 1. Next AREA B: Oahu KSSA 2, TA/2 and 3. Then AREA D, TA/S 4, Oahu KSSA's 4,5,6 and 7, TA/S 5 and 6. End in Area A: HNL.
- 4 **Circle Island Oahu** - Departs Honolulu Airport and flies in counterclockwise direction. Start in AREA A: HNL, Oahu KSSA 1, TA/S 1. Next AREA B: Oahu KSSA 2, TA/2 and 3. Next AREA D: TA/S 4, Oahu KSSA's 4,5,6 and 7. Then AREA E: Oahu KSSA 8, TA/S 6. End in Area A: HNL.
- 5 **Circle Island West Side Oahu** - Departs Honolulu Airport and flies in counterclockwise direction. Start in AREA A: HNL, Oahu KSSA 1, TA/S 1. Next AREA B: Oahu KSSA 2, TA/2 and 3. Next AREA D: TA/S 4, Oahu KSSA's 4,5,6 and 7. Next AREA E: Oahu KSSA 8, TA/S 6. Next Area F: TA/S 7, Oahu KSSA 9. Then AREA D: TA/S 6. End in Area A: HNL.

TA/S 1– Transition flight between Oahu KSSA 1 and Oahu KSSA 2. Transition aircraft departing HNL will be in contact with HCF departure and will comply with all instructions from ATC at Oahu KSSA-1 and within the airspace. Once released from HCF departure, flight will continue to Oahu KSSA 2 between 800 ft MSL- 1500 ft MSL to avoid inbound traffic over CKH VOR and Maunaloa bay.

TA/S 2 – Transition flight between Oahu KSSA 2 and Oahu KSSA's 4-7. Transition aircraft will follow around the east side of Oahu and continue through NGF Class Delta airspace. All aircraft will comply with all instructions from NGF ATC while transiting the airspace. Aircraft will continue Northbound to Ka'a'awa valley or southwest bound to the Nu'uaniu Pali (TA/S 3). Aircraft will maintain between 800 ft MSL and 1500 ft MSL (not below 1000 ft AGL over land).

TA/S 3 – Transition flight between TA/S 2 and Oahu KSSA 3 or Oahu KSSA's 4-7. Transition aircraft will continue southwest bound through the Nu'uaniu Pali or the H3 and continue through HNL Class Bravo Airspace. All aircraft will comply with all instructions from HCF while transiting the airspace. Aircraft may also continue on the windward side northbound along the ridgeline towards Waikane. Aircraft may continue to be under control of NGF airspace if transitioning from TA/S 2. Aircraft will maintain between 1000 ft MSL and 2000 ft MSL (not below 800 ft AGL).

TA/S 4– Transition flight between Oahu KSSA's 4-7 and Oahu KSSA 8. Transition aircraft will traverse the valleys and/or the shoreline and continue northbound towards the Northshore. Aircraft will maintain between 2300 ft MSL and 800 ft MSL (not below 800 ft AGL) to maintain a prevailing flight altitude while traversing variable terrain.

TA/S 5- Transition flight between TA/S 4 and TA/S 6. Transition aircraft will traverse the Ko'olau mountains towards Central Valley. Aircraft will maintain 2300 ft MSL to maintain a prevailing flight altitude while traversing variable terrain.

TA/S 6 – Transition flight between Oahu KSSA 8 and TA/S 5 to TA/S 7 or Interchange. Transition aircraft will continue southbound through Central Valley or westbound to Māi'li Pass through HHI Class Delta airspace. All aircraft will comply with all instructions from HHI ATC while transiting the airspace. Aircraft terminating in HNL Class Bravo Airspace will contact HCF approach prior to the interchange and will comply with all ATC instructions and approach procedures. Aircraft will maintain between 2300 ft MSL and 1000 ft MSL (not below 800 ft AGL).

TA/S 7– Transition flight between TA/S 6 and Oahu KSSA 9. Transition aircraft will continue southwest bound and traverse the Waianae mountains and continue through JRF Class Delta Airspace to the west side lagoons. Aircraft will comply with all instructions from JRF ATC at Oahu KSSA 9 and within the airspace. Aircraft returning to HNL will transit eastbound back towards TA/S 6 through JRF airspace. Aircraft will maintain between 2500 ft MSL and 1000 ft MSL (not below 800 ft AGL).

Oahu KSSA - 1:Waikiki, 2:Hanauma Bay, 3:Lulumahu Falls 4:Ka'a'awa Valley, 5:Kahana Valley, 6:Punaluu Valley, 7:Sacred Falls, 8:Surf Breaks 9: Lagoons

AREA A: This area includes HNL Bravo airspace including Ford Island and extends eastbound to Kokohead. This is a high-density traffic area and includes all departures and approaches at HNL International Airport. Aircraft must maintain vigilance at all times for traffic avoidance. The South Shore of Oahu is typically dry and sunny, but fast-moving weather cells often move through from the east producing rain showers that temporarily reduce visibility.

AREA B: This area starts at Hanauma Bay and stretches around the east side to the windward side of the island. The windward side receives more rainfall due to orographic precipitation and this is most likely to be where low clouds will be encountered during a transition. Pilots are encouraged to turn around at multiple check points in the event of reduced ceilings and visibility. Weather information can be obtained from NGF ATIS and Tower.

AREA C: This area covers the Nuuanu Pali transition extending toward Punchbowl and into Honolulu's Bravo airspace. While generally clear, it can be affected by windward weather due to the unique microclimate in the pass.

AREA D: This area extends from Ka'a'awa Valley shoreline and includes the Ko'olau mountain range crossing into the Central Valley Southbound to Ford Island. The weather in this region is influenced by Oahu's rugged terrain and prevailing trade winds. Weather conditions along the shoreline are typically clear but sometimes experience periodic rain showers and cloud cover. Pilots can expect the Ko'olau mountain range to have frequent cloud cover above the mountain range. In the Central Valley, generally clear skies prevail, however, open plains allow for rain clouds to move from either mountain range, often producing Rainbows. Visibility may drop due to heavy rains or low clouds spilling over from the mountains making this area a necessary transition for pilots to return to HNL. Overall, weather in this area can shift rapidly due to the Ko'olau Mountains' microclimates.

AREA E: This area includes the North Shore and extends west to Kaena point. The weather tends to be drier with less rainfall than the windward side. However, cloud buildup and isolated showers with reduced visibility are possible along the shoreline.

AREA F: This area is the west side of the island and extends from the vicinity of JRF airport to Kaena point. The weather has a warm, dry climate and there is not much chance of reduced ceilings and visibility. However, on days when there are southerly winds, weather can build on this side of the island and move east. Some weather information can be received from JRF Airport ATIS and Tower.

Revision Number – Draft

Effective Date – 00/00/00

OAHU KSSA 1 – Waikiki

Frequency: HCF Approach as assigned

Entry and Exit Altitude: 500ft MSL or as directed by HCF APP

- Ingress from the Ala Wai Harbor, Egress Diamond Head
- Ingress and Egress calls not made as communication is all with HCF APP



OAHU KSSA 2 – Hanauma Bay

Frequency: 122.850

Entry and Exit Altitude: 500ft - 1500ft MSL. Approaching traffic will be at 2000ft descending in this area.

- Ingress off-shore from Kokohead, Egress Off-shore north side of bay.
- Ingress call should be, “Hanauma Bay for a turn.” or “Exiting Hanauma for Makapu’u.”

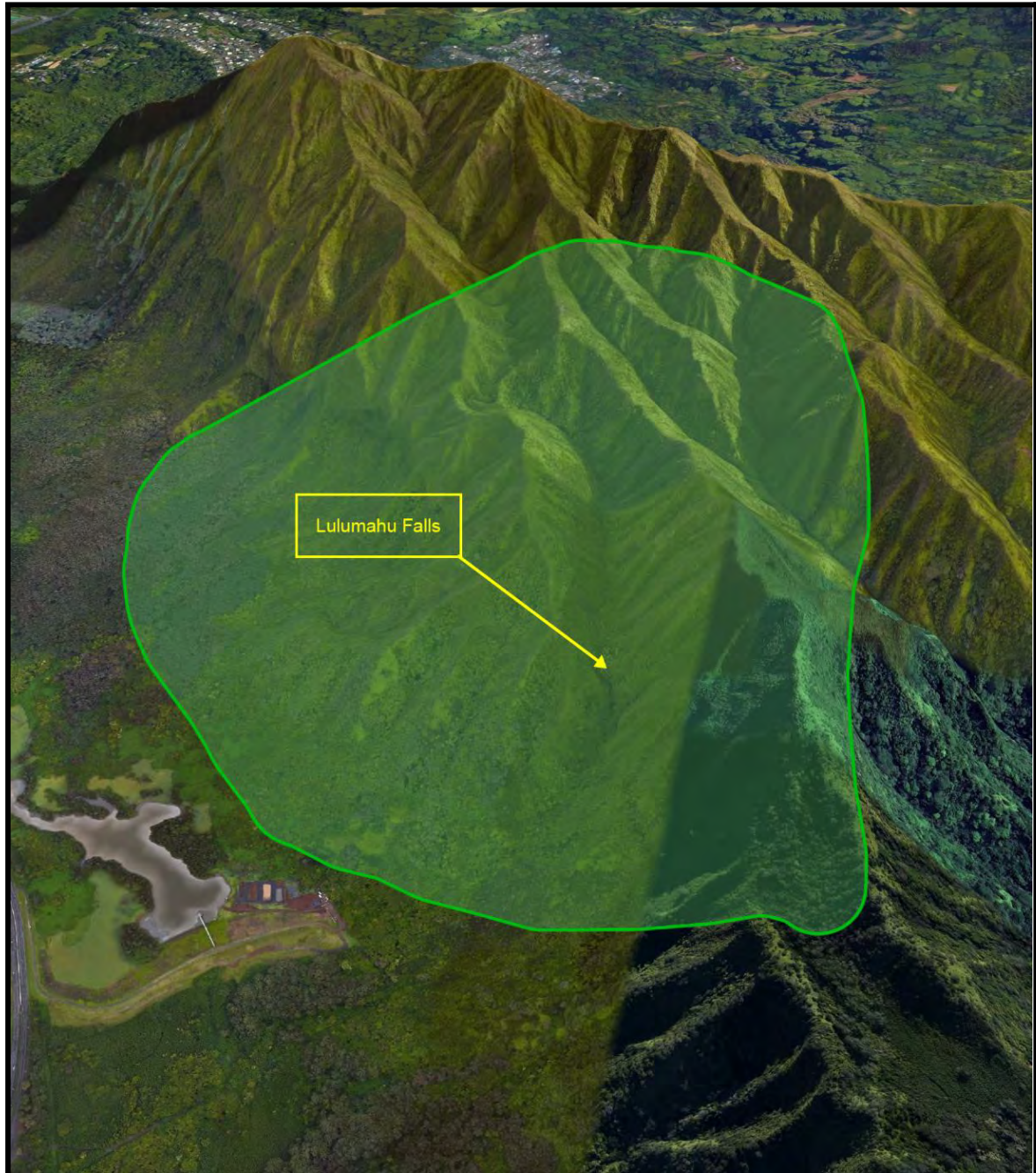


OAHU KSSA 3 – Lulumahu Falls

Frequency: 122.850

Entry and Exit Altitude: 1500ft - 2500ft MSL or 500 ft AGL.

- Ingress/Egress from Nuuanu Valley
- Ingress call should be, “Entering Lulumahu for turns” or “Exiting Lulumahu to the North/South”



OAHU KSSA 4 – Ka’a’awa Valley

Frequency: 122.850

Entry and Exit Altitude: 1000 ft-2000ft MSL from Shoreline to the back of the valley.

- Ingress from RR #3 or Shoreline front of the valley
- Egress Across RR #3 at back of valley or RR #4 to Kahana Valley or back to the shoreline at the front
- Ingress call should be, “Waikane or Shoreline for back of Ka’a’awa.”
- Egress call should be, “Back of Ka’a’awa for Kahana,” or “Back of Ka’a’awa for the Shoreline.”

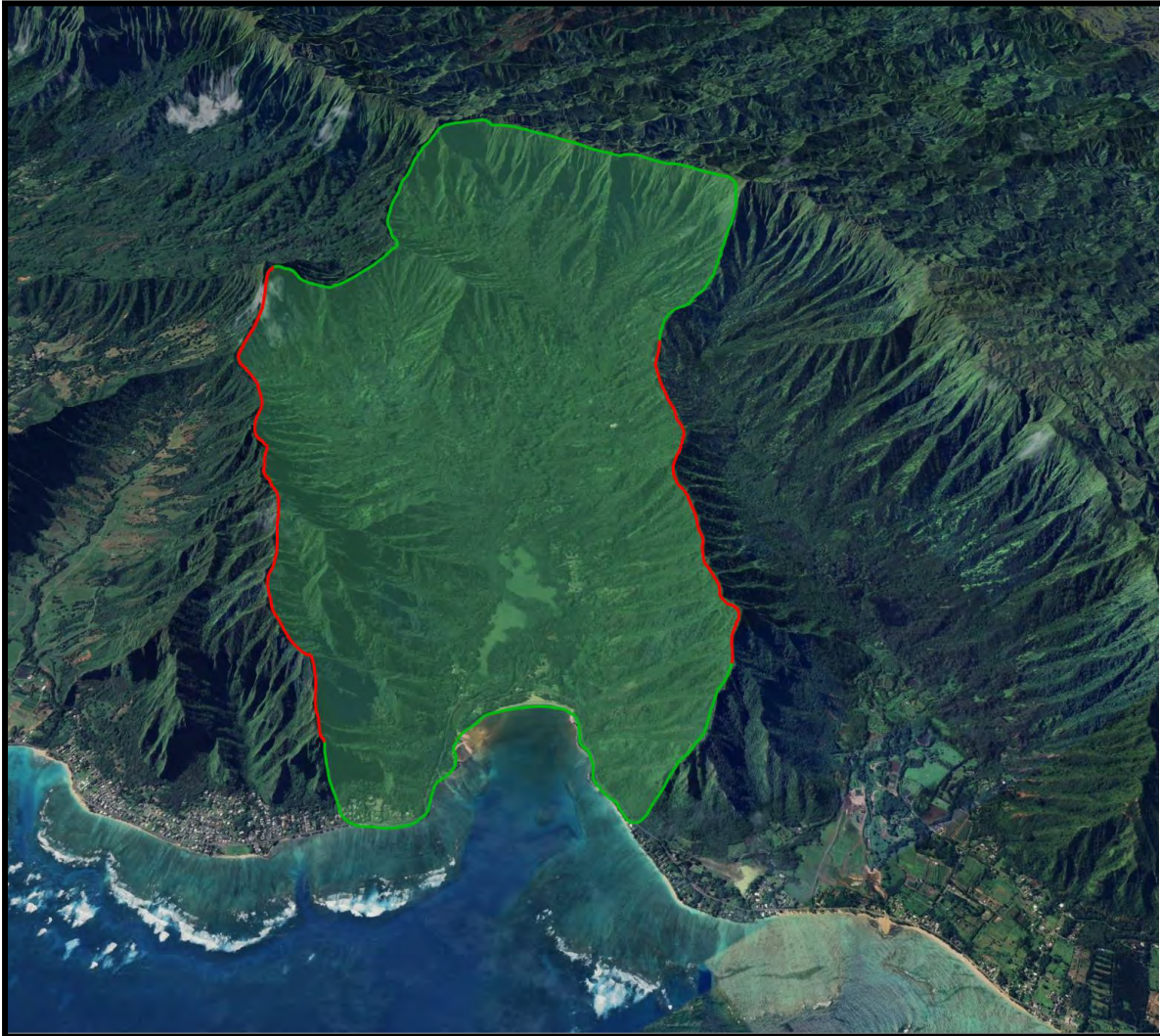


OAHU KSSA 5 – Kahana Valley

Frequency: 122.850

Entry and Exit Altitude: 1000 ft-2000ft MSL from Shoreline to the back of the valley.

- Ingress from RR #4 and back of Ka'a'awa or from the front of the valley
- Egress Across RR #5 into Punaluu Valley or back to the shoreline at the front
- Ingress call should be, "Back of Ka'a'awa for back of Kahana." or "Shoreline for back of Kahana."
- Egress call should be, "Back of Kahana for Punaluu," or "Back of Kahana for the Shoreline."



Revision Number – Draft

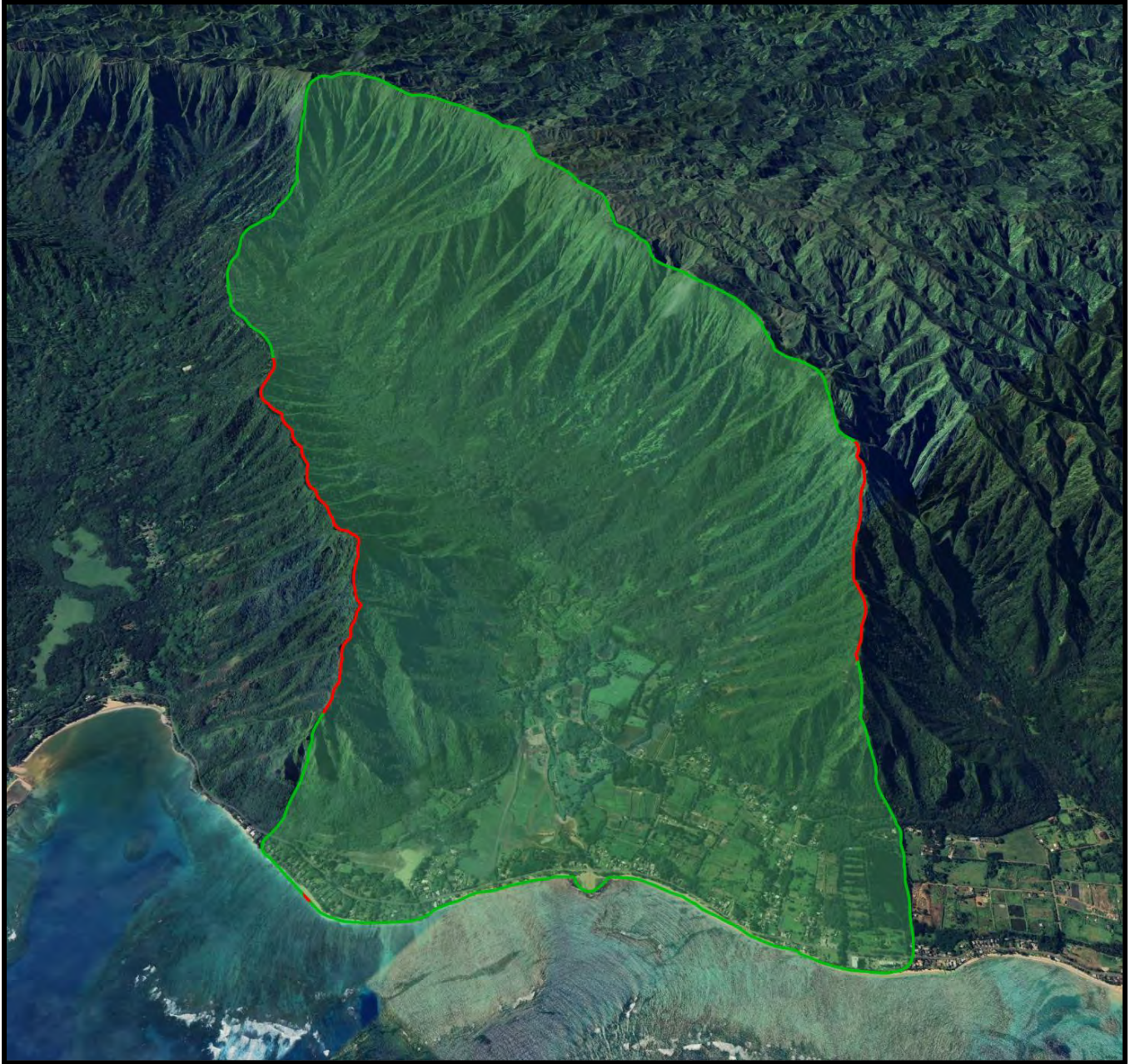
Effective Date – 00/00/00

OAHU KSSA 6 – Punaluu Valley

Frequency: 122.850

Entry and Exit Altitude: 1000 ft-2000ft MSL from Shoreline to the back of the valley.

- Ingress from back of Kahana or from the front of the valley
- Egress Across RR #6 into Sacred Falls or back to the shoreline at the front
- Ingress call should be, “Back of Kahana for back of Punaluu.” or “Shoreline for back of Punaluu.”
- Egress call should be, “Back of Punaluu for Sacred,” or “Back of Punaluu for the Shoreline.”

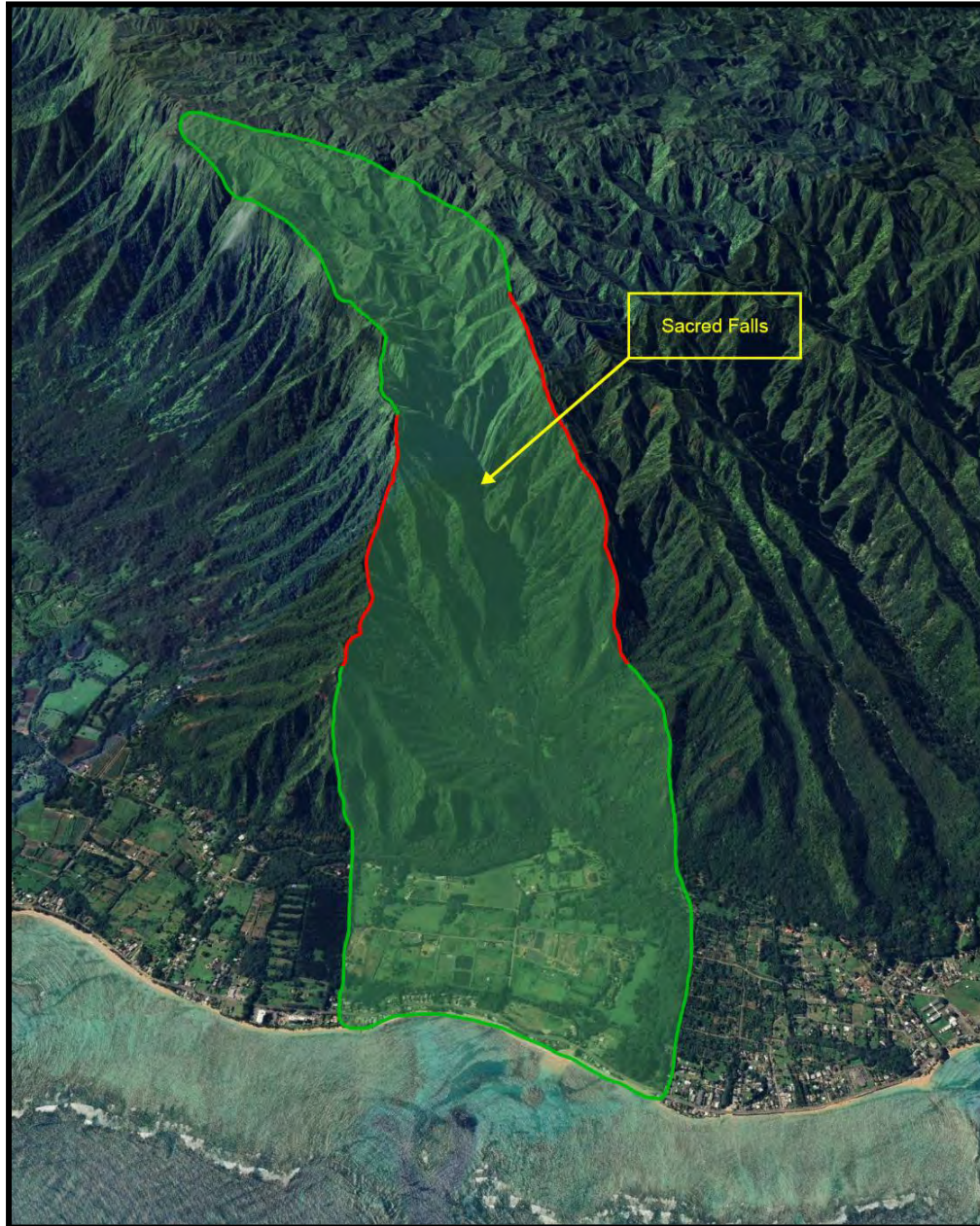


OAHU KSSA 7 – Sacred Falls

Frequency: 122.850

Entry and Exit Altitude: 1000-1500ft MSL

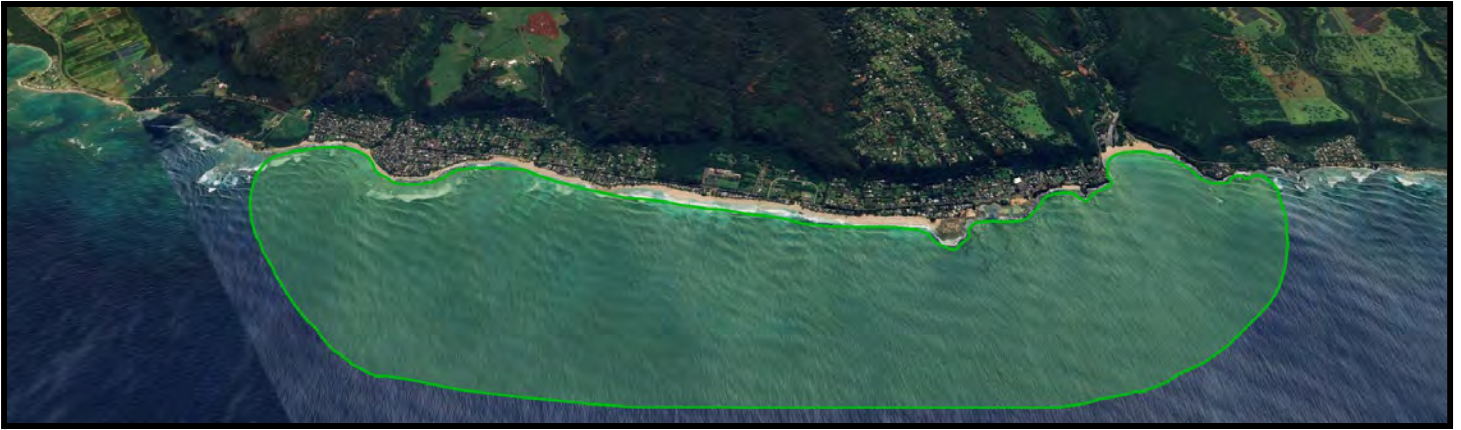
- Ingress from Punaluu across RR #6 or Shoreline
- Egress across RR #7 to Laie or to the Shoreline.
- Ingress call should be, “Punaluu entering Sacred South Wall for turns” or “Shoreline entering Sacred for turns.”
- Egress call should be, “Exiting Sacred Falls North Wall to Laie,” or “Exiting Sacred Falls for the Shoreline.”



OAHU KSSA 8 – Surf Breaks

Entry and Exit Altitude: 500ft - 1500ft MSL

- Ingress off-shore from Golfballs, Egress Off-shore Waimea Bay.
- Ingress call should be, “Golfballs for Waimea.” Egress call should be, “Exiting Waimea for Dole.”



Revision Number – DraftEffective Date – 00/00/00**OAHU KSSA 9 – The Lagoons**

Frequency: 132.6

Entry and Exit Altitude: 1000ft - 1500ft MSL

- Ingress off-shore from Electric Beach, Egress Off-shore Malakole Harbor
- Ingress and Egress calls not made as communication is all with JRF ATC
- Suitable landings – Ko’olina Marina and resort land and parking lots water if floats installed



The map displays the Hawaiian Islands with four study areas highlighted in yellow: Area A (central), Area B (western), Area C (northern), and Area D (southern). Sixteen numbered locations (1-16) are marked with red dots. Area A contains locations 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, and 16. Area B contains locations 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, and 16. Area C contains locations 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, and 16. Area D contains locations 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, and 16. The map also shows various geographical features, including Waimea River, Hanalei Bay, and various points of interest like Makaha Point, Nohili Point, and Mana Point. The map is oriented with North at the top.

The island of Kauai has four (4) CATFP, sixteen (16) Transition Areas/Segments (TA/S), fourteen (14) Known Site specific Areas (KSSA), and twenty-one (21) Approved Razorback Ridgeline (RR) crossings.

NOTE: This map should be utilized to easily locate the WSSA, WESA, KSSA, Transition Areas/Segments and Razorback Ridgelines only. This map is not to be utilized for Navigational purposes.

CAUTION: Weather descriptions and CATFP in this section are based on “normal” trade wind flow. It must be recognized that winds from other directions will lead to at best different and at worst opposite weather conditions and opposite routing. Therefore, pilot risk assessments will have higher risk values when winds are other than trade winds (i.e. Kona winds).

CATFP - Descriptions are based on “normal” trade wind flow. The routing listed is general and can change based on winds, turbulence and weather patterns. Therefore, pilots may choose to only fly portions of a specific CATFP depending on what areas are available.

1. **Complete Island Kauai (Departing LIH)** - Departs Lihue Airport and flies in a clockwise direction. Start in AREA A: LIH, TA/S 1 or 2 then possibly 3, KSSA 1, then AREA B, TA/S 4, KSSA 2 and 3, TA/S 5,6 or 7, then AREA C, KSSA 4,5, and 6, TA/S 8,9,10,11,12. or AREA D, TA/S 10,12,13, KSSA 13, 12. Then AREA D: TA/S 14, 15. End in AREA D:LIH.
2. **Complete Island Kauai (Departing Princeville)** - Departs Princeville Airport (PVA) and flies in a clockwise direction. Start in AREA D: PVA, TA/S 11, KSSA 10,11,12 or TA/S 11, 10 KSSA 12. Then AREA A: TA/S 16 or 15 and 1, KSSA 1. Then AREA B: TA/S 1 or 4 to KSSA 2 and 3, TA/S 5,6 or 7 KSSA 3,4,5 and 6. Then AREA C: TA/S 8 and 9, KSSA 8 and 9. Then AREA D: TA/S 10 and 11, End in AREA D: PVA.
3. **Windward side and Na Pali Coast (Departing LIH)** - Departs LIH and flies in counterclockwise direction. Start in AREA A: TA/S 8,10 and 9, Then AREA C: KSSA 6,5,4 TA/S 8,9, KSSA 7,8,9,10,11,12 or AREA D: TA/S 10,12,13, KSSA 13 and 12. Then AREA A: TA/S 14 End in AREA A: LIH.
4. **Windward side and Na Pali Coast (Departing PVA)** - Departs PVA and flies in counterclockwise direction. Start in AREA D: TA/S 11,10,9 or 8. Then AREA C: KSSA 6,5,4 TA/S 8,9, KSSA 7,8,9,10,11,12 or AREA D: TA/S 10,12,13, KSSA 13 and 12. Then AREA A: TA/S 14, 8. Then AREA D: TA/S 8,13,10,11. End in AREA D: PVA.

TA/S – 1: LIH to Tree Tunnel RR or Poipu at or above 1500ft MSL. Shoreline portions 800ft MSL to 1500ft MSL.

2: Tree tunnel RR to South Kauai VOR to KSSA 1 or TA/S 3 at or above 1500ft MSL. Shoreline portions 800ft MSL to 1500ft MSL

3:Transition from Tree Tunnel RR to KSSA 1 and TA/S 4 at or above 1500 MSL

4: Hanapepe Valley (KSSA 1) to Olokele Valley (KSSA 2) and Waimea Canyon (KSSA 3). Depart Hanapepe Valley at or above 2300ft MSL climbing to cross RR as appropriate descending to enter Olokele Valley at or above 1500ft MSL or to enter Waimea Canyon at or above 1500ft MSL.

5:Transition from south entrance of Waimea Canyon (KSSA 3) to the Na Pali Coast. Exit Waimea between 1500ft MSL and at or above 2500ft MSL descending to the agricultural area southeast of Barking Sands. Maintain between 800ft MSL to at or above 1500ft MSL directly over the shoreline to the mouth of Nualolo Valley (KSSA 4).

6: Enter from Waimea Canyon (KSSA 3) near the upper mic at or above 4000ft MSL or lower mic at or above 3200ft MSL. As the terrain descends make a slow descent to a minimum of 2700 ft MSL flying to pick up one of the 5 depicted draws (yellow numbers) to the shoreline. Upon entering a draw, make a descent between 800ft MSL to at or above 1500ft MSL at the shoreline and fly along TA/S 5 to Nualolo Valley (KSSA 4). If 3000ft MSL or higher can be maintained, can fly direct to the back of Nualolo Valley (KSSA 4).

7: Transition from the back of Waimea (KSSA 3) to the Back of Kalalau Valley (KSSA 6) or into Wainiha Valley 4500 ft MSL or above.

8: Shoreline Transition from Nualolo Valley (KSSA 4) KSSA 5,6 to Lumahai Valley (KSSA 8) or TA/S 9,11,13 or LIH. 800ft MSL to at or above 1500ft MSL.

9: Transition from Lumahai Beach to Namolokama (KSSA 9). 800ft MSL to at or above 1500ft MSL above the shoreline then 1500ft MSL or above to enter KSSA 9.

10: Transition from Namolokama (KSSA 9 to KSSA 10,11 and 12. 1500ft MSL or above at KSSA 9 climbing to minimum 1600ft MSL until turning south to cross the RR enroute to Waialeale Crater (KSSA 12) or TA/S 14.

11: Transition from shoreline to Princeville airport and TA/S 10. 800ft MSL to at or above 1500ft MSL shoreline to airport climbing to 1600ft MSL or above to join TA/S 10. Can also be flown in the opposite direction.

12: Kalihiwai gap transition. depart Kalihiwai valley at or above 2000ft MSL to cross the RR at or above 2300ft MSL. Descend to 1600ft MSL or above to join TA/S 10.

13: Transition Anapalau Point to TA/S 10. Shoreline 800ft MSL to at or above 1500ft MSL minimum climbing to 1600ft MSL or above to join TS/A 10. Can also be flown in the opposite direction.

14: Transition from Waialeale Crater (KSSA 12) to LIH. Enter at or above 1600ft MSL minimum descending to LIH as directed by ATC.

15: Transition from Waialeale (KSSA 12) to TA/S 1. enter from Waialeale at 1600ft MSL minimum climb as necessary to enter TA/S 1 at or above 1500ft MSL.

16: Transition from Waialeale (KSSA 12) to Hanapepe Valley (KSSA 1). Depart Waialeale at or above 1600ft MSL climbing to cross the RR into Hanapepe Valley (KSSA 1) at or above 3300ft MSL.

Kauai KSSA – 1: Hanapepe Valley, 2: Olokele Canyon, 3: Waimea Canyon, 4: Nualolo Valley, 5: Honopu Valley, 6: Kalalau Valley, 7: Wainiha Valley, 8: Lumahai Valley, 9: Namolokama, 10: Hanalei Valley, 11: Kalihiwai Valley, 12: Waialeale, 13: Makaleha, 14: Waiahi

AREA A: Lihue area through the Hanapepe Valley and south to Kalaheo and Poipu, up through the Olokele Canyon to Waimea Canyon. Area A also extends north from LIH to Kapaa. The area contains varied terrain from open pasture lands to mountainous valleys full of trees with thick overgrowth in some areas and open flat terrain in other areas. The area precipitation is high in green rain forest valleys near the center of the island and therefore lower clouds can exist and make transition to the leeward side (AREA B) difficult. Therefore, many transition options exist to include the south shoreline.

AREA B: This area extends from the Port Allen area up to and through the Waimea canyon to Barking Sands and to the Na Pali Coast. This is the Leeward side of the island and is therefore typically very dry but can be very turbulent as winds coming from the northeast get swirled around by the valleys. There are flat agricultural areas near Barking Sands but as you move north the terrain begins to transition to windward where there is more rainfall and lower clouds.

AREA C: This is the Na Pali Coast. Aircraft will primarily be over the water but will enter the valleys. Clouds can be low, and rainfall is a common occurrence especially on the northern end of the Na Pali as you approach Hanalei Bay and Valley. Winds on the Na Pali can be high, and turbulence can be a factor. Birds are prevalent in this area.

AREA D: From the Hanalei River Valley out to the power line road and east to the Anahola gap. The area includes the Koloa Forest Reserve southeast of Mt. Waialeale. This is the windward side of the island and therefore the area precipitation is extremely high in rain forest valleys with lush growth to high rainfall areas in green fertile valleys with some zones of little growth or intermittent scrub brush tapering off to moderate rainfall areas over green pasture lands.

KAUAI KSSA 1 - Hanapepe Valley

Frequency: Kauai tour CTAF 127.05

Entry at or above 1500ft MSL from TA/S 3 to Manawaiopuna (Jurassic) and Kahili Falls at or above 1200ft MSL
Call “Entering Hanapepe for Jurassic” - Opposite on way out.

Entry from TA/S 16 to Jurassic Falls. Cross RR at or above 3300ft MSL descends to at or above 1200ft MSL at Jurassic Falls.

Call “Back of Hanapepe for Jurassic.”

Exit TA/S 3 at or above 1500ft MSL climbing to at or above 2300ft MSL minimum.

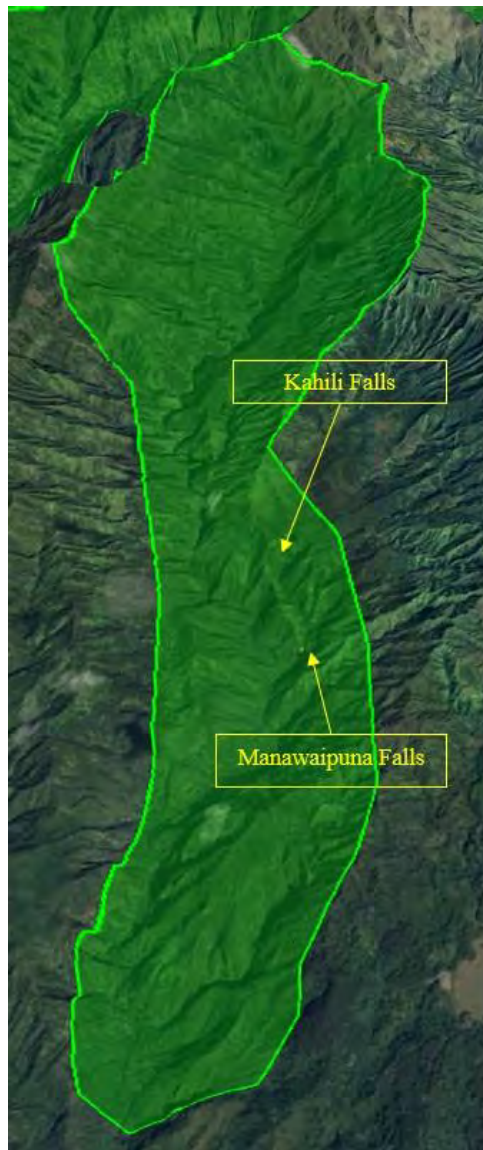
Call “Hanapepe front door for Waimea.”

Exit TA/S 4 at or above 2300ft MSL climbing for Olokele and Waimea.

Call “Hanapepe for Olokele.”

Turns at Jurassic Falls and Kahili Falls at or above 1200ft MSL

Low point Hanapepe is 500ft MSL

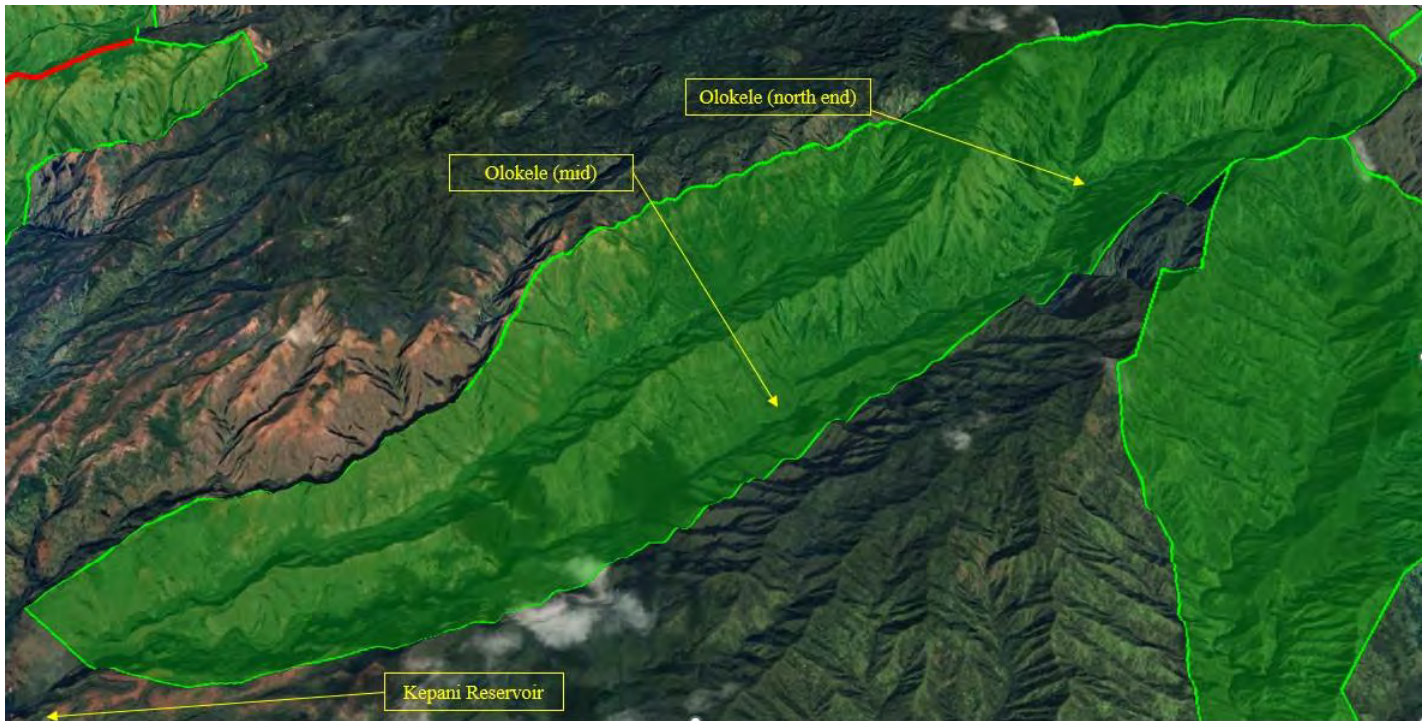


~~Revision Number = Draft~~~~Effective Date = 00/00/00~~**KAUAI KSSA 2 - Olokele Canyon**

Frequency: Kauai tour CTAF 127.05

Entry over the stream at or Above 1000ft MSL climbing for at or above 2500ft MSL at the back north end.
Call “Olokele for the north end.” Opposite on the way out.

Exit over the stream at or above 1000ft MSL to join TA/S 4 for Waimea Canyon (KSSA 3).
Call “Olokele for Waimea.”



KAUAI KSSA 3 - Waimea Canyon

Frequency: Kauai tour CTAF 127.05

Entry from TA/S 4 at or above 1500ft MSL Climbing for Waipo'o falls at or above 2500ft MSL.
Call "Entering Waimea for Waipo'o"

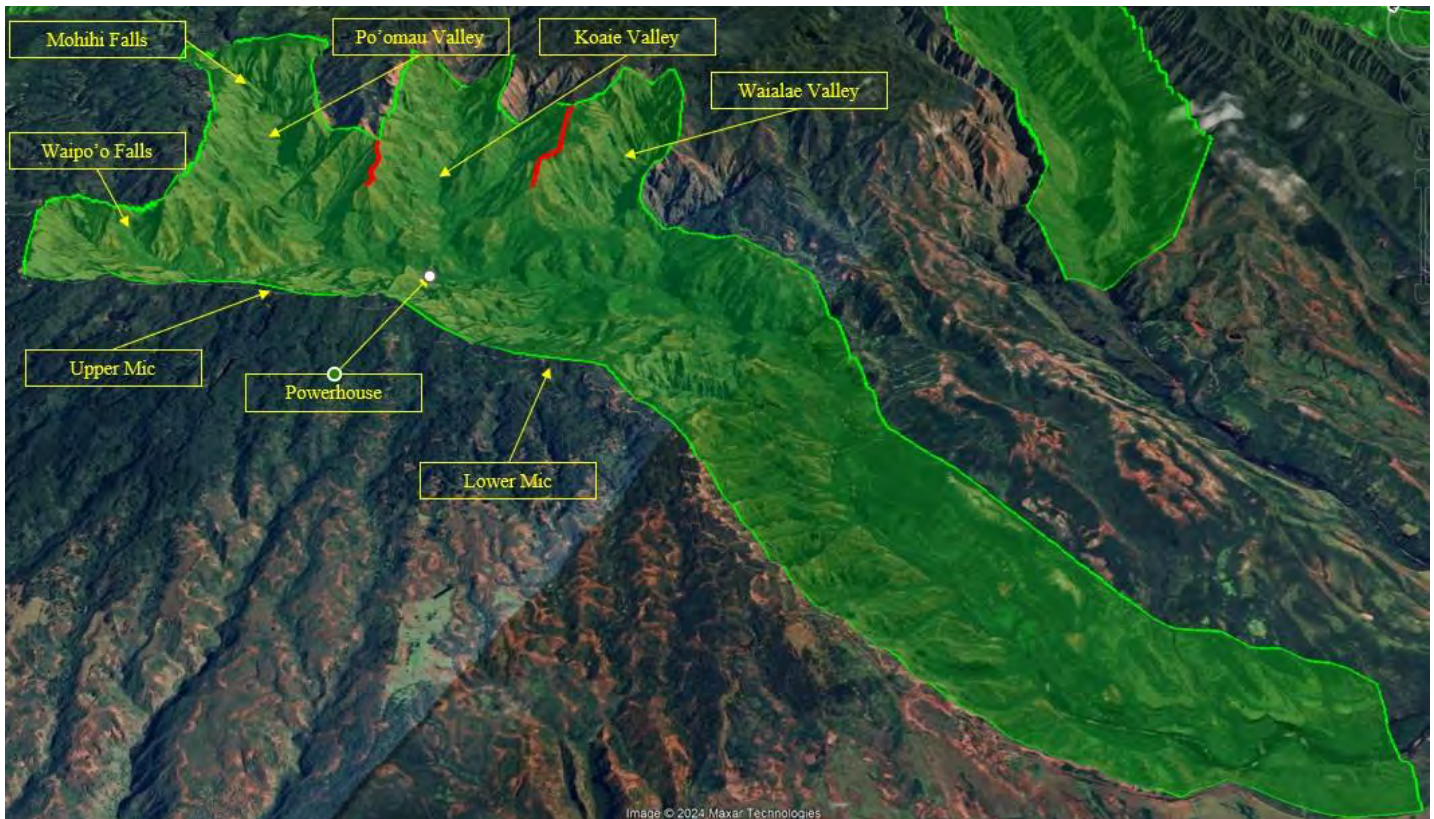
Entry into Poomau, Koaie and Waialae Valleys at or above 1500ft MSL climbing for the backs at or above 2200ft MSL.
Calls, "Front of Poomau for the Back," "Front of Koaie for the back," "Front of Waialae for the back."

Exit upper or lower mic between 3200ft MSL top at or above 4000ft MSL to TA/S 6.
Call, "upper or lower mic for the shoreline or Nualolo."

Exit south entrance of valley between 1500ft MSL and at or above 2500ft MSL to join TA/S 5.
Call "south entrance Waimea for the shoreline"

Exit the back of Poomau Valley at or above 4500ft MSL to join TA/S 7 for the back of Kalalau or Wainiha Valleys.
Maintain 1500' Clearance from canyon lookouts.

Can cross RR between valleys



~~Revision Number = Draft~~~~Effective Date = 00/00/00~~**KAUAI KSSA 4 - Nualolo Valley**

Frequency: Kauai tour CTAF 127.05

Entry into the back of the valley from TA/6 at or above 3000ft MSL descending to between 800ft MSL to at or above 1500ft MSL over the shoreline.

Call “Back of Nualolo for the shoreline.

Entry from the shoreline between 800ft MSL to at or above 1500ft MSL for the back at or above 1200ft MSL

Call “Shoreline Nualolo for the back.”

Exit shoreline eastbound between 800ft MSL to at or above 1500ft MSL to TA/S 8

Call “shoreline Nualolo for Honopu”

Low point of the valley is 500ft MSL.



KAUAI KSSA 5 - Honopu Valley

Frequency: Kauai tour CTAF 127.05

Entry from the shoreline between 800ft MSL to at or above 1500ft MSL for the back at or above 1400ft MSL
Call “Shoreline Honopu for the back.”

Exit shoreline eastbound between 800ft MSL to at or above 1500ft MSL to TA/S 8
Call “shoreline Honopu for Kalalau.”

Low point of the valley is 700ft MSL.



~~Revision Number = Draft~~~~Effective Date = 00/00/00~~**KAUAI KSSA 6 - Kalalau Valley**

Frequency: Kauai tour CTAF 127.05

Entry from the shoreline between 800ft MSL to at or above 1500ft MSL for the back at or above 1700ft MSL
Call "Shoreline Kalalau for the back."

Entry from TA/S 7 at or above 4500ft MSL descending for the shoreline between 800ft MSL to at or above 1500ft MSL.

Call "Back of Kalalau for the shoreline."

Exit shoreline eastbound between 800ft MSL to at or above 1500ft MSL to TA/S 8
Call "shoreline Kalalau for Ke'e."

Low point of the valley is 1000ft MSL.



Revision Number = DraftEffective Date = 00/00/00**KAUAI KSSA 7 - Wainiha Valley and KSSA 8 - Lumahai Valley**

Frequency: Kauai tour CTAF 127.05

Entry into Lumahai Valley from the shoreline between 800ft MSL to at or above 1500ft MSL for the back at or above 2500ft MSL

Call "Shoreline Lumahai for the back."

Exit Back of Lumahai for the shoreline at or above 2500ft MSL descending between 800ft MSL to at or above 1500ft MSL at the shoreline

Call, "Back of Lumahai for the shoreline."

Entry into Wainiha valley over the lower RR at or above 2400ft MSL over the upper RR at or above 3700ft MSL descending over the stream for at or above 2400ft MSL at the back of the valley.

Call, "entering Wainiha for the back."

Exit the Back of Wainiha Valley over the RR into Hanalei Valley at or above 3400ft MSL.

Call "Back of Wainiha into Hanalei."



~~Revision Number = Draft~~~~Effective Date = 00/00/00~~**KAUAI KSSA 9 - Namolokama**

Frequency: Kauai tour CTAF 127.05

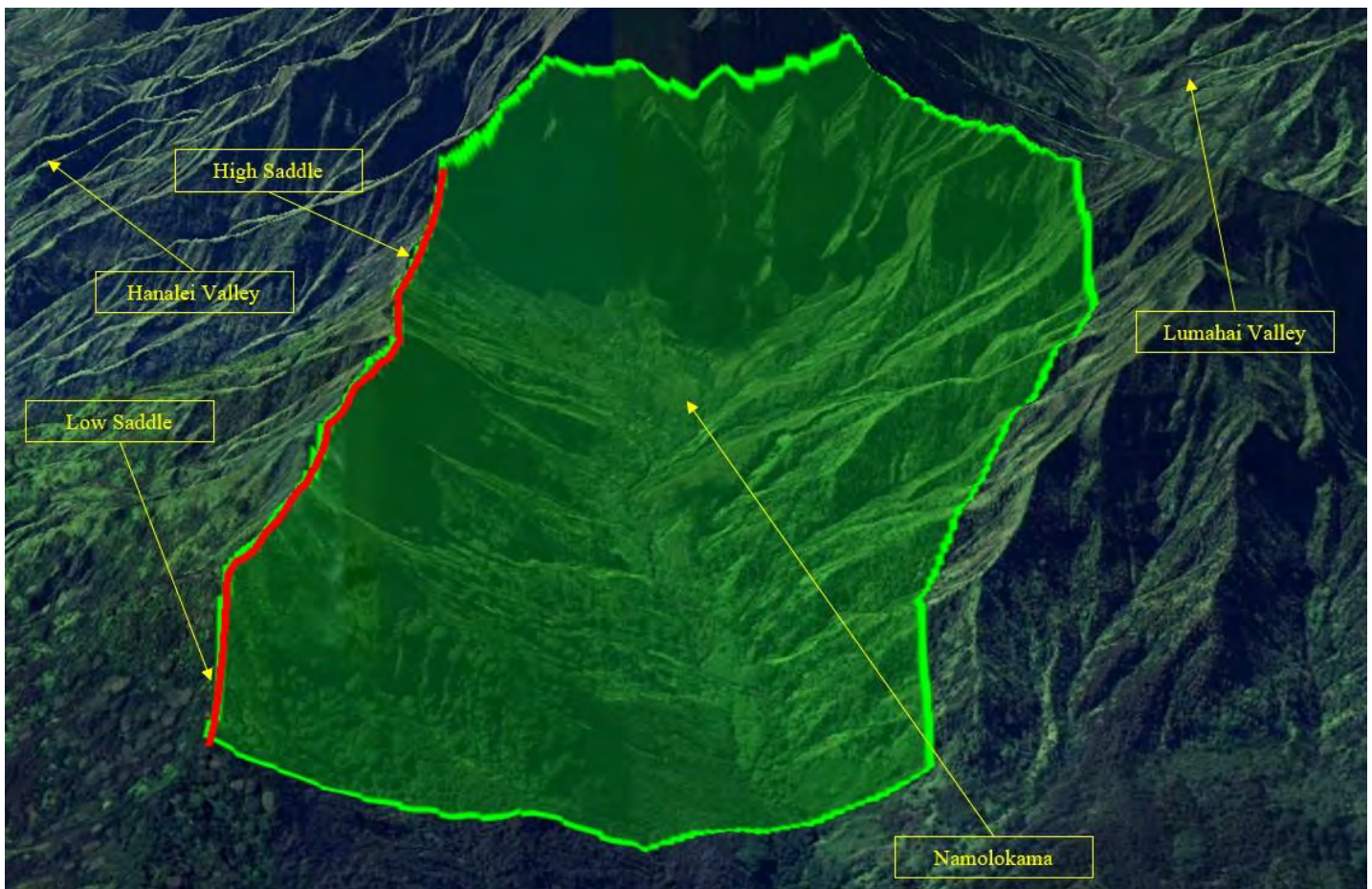
Entry from TA/S 9 or 10 at or above 1500ft MSL climbing for the back at or above 1800ft MSL.
Call "Front of Namolokama for the back."

Exit over upper saddle RR at or above 2200ft MSL.
Call "Namolokama for the Upper Saddle"

Exit over lower saddle RR at or above 1500ft MSL.
Call "Namolokama for the Lower Saddle"

Exit to TA/S 10 at or above 1500ft MSL.
Call "front of Namolokama for Hanalei Valley."

Low point of the valley is 800ft MSL.



~~Revision Number = Draft~~~~Effective Date = 00/00/00~~**KAUAI KSSA 10 - Hanalei Valley and KSSA 11 - Kalihiwai Valley**

Frequency: Kauai tour CTAF 127.05

Entry into Hanalei Valley from high or low saddle at or above 2200ft MSL descending for the back at or above 1500ft MSL.

Call "High or low saddle for the back of Hanalei."

Entry into Hanalei Valley from TA/S 10 over the stream at or above 1500ft MSL climbing for the back of Hanalei Valley at or above 1700ft MSL.

Call "Front of Hanalei for the back."

Exit across the back of Hanalei over the RR at or above 2200ft MSL into Waialeale area (KSSA 12).

Call, "Back of Hanalei for the North wall."

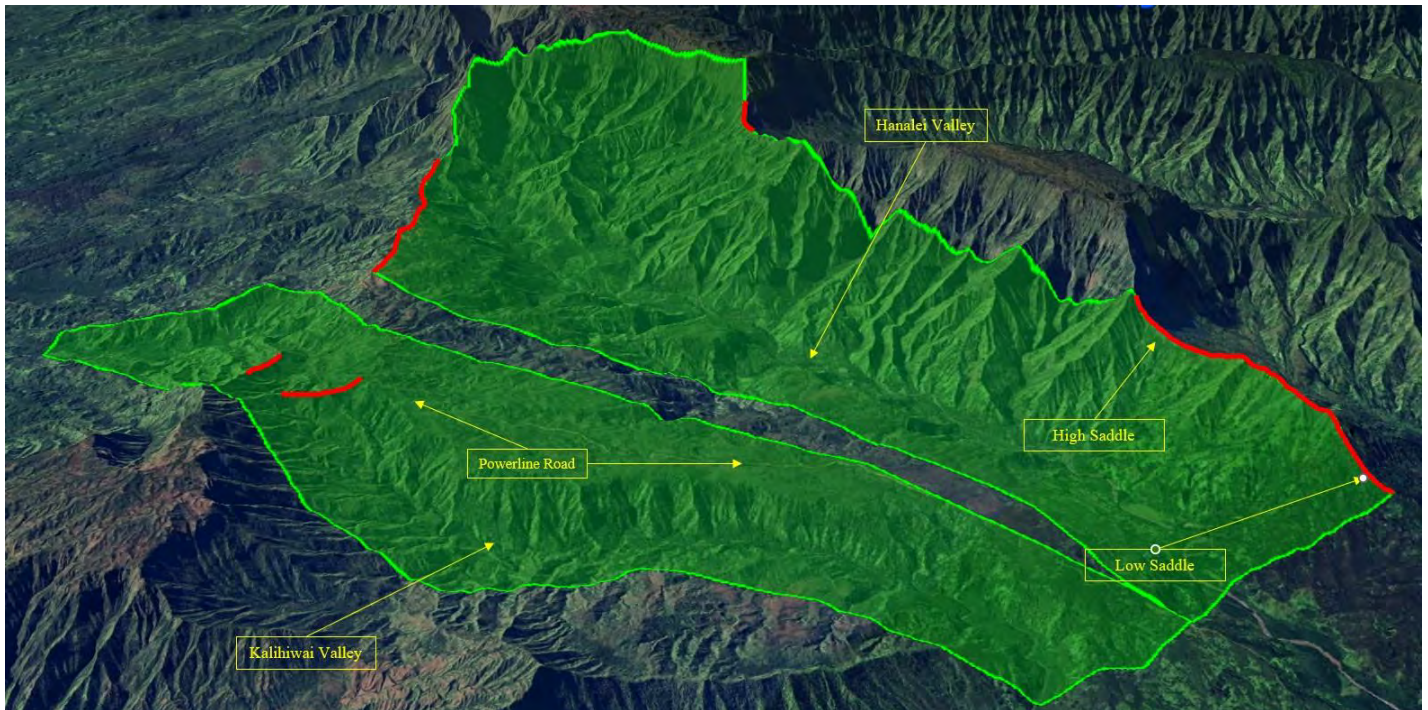
Exit front of Hanalei descending from the back at or above 1700ft MSL for the front over the stream at or above 1500ft MSL

Call, "back of Hanalei for the front."

Enter into Kalihiwai Valley over the stream form TA/S 10 at or above 1500ft MSL climbing to cross the RR's at the back at or above 2400ft MSL then descending to 1600ft MSL to join TA/S 10 for Waiale ale or back to LIH.

Call, "Front of Kalihiwai for the back," then "Back of Kalihiwai for the North Wall."

Exit Kalihiwai at mid valley at or above 2000ft MSL to join TA/S 12 climbing to cross the RR at or above 2200ft MSL then descending to join TA/S 10 at or above 1600ft MSL.



~~Revision Number = Draft~~~~Effective Date = 00/00/00~~**KAUAI KSSA 12 - Waialeale**

Frequency: Kauai tour CTAF 127.05

Enter from RR at the back of Hanalei at or above 2200ft MSL then descending to 2600ft MSL or above for the North Wall and entry into the Crater

Call, "Back of Hanalei for the North Wall." Then "North Wall for the Crater."

Enter from TA/S 10 at or above 1600ft MSL climbing for the North Wall and entry into the Crater at or above 2600ft MSL.

Call, "Anahola for the North Wall." Then "North Wall for the Crater."

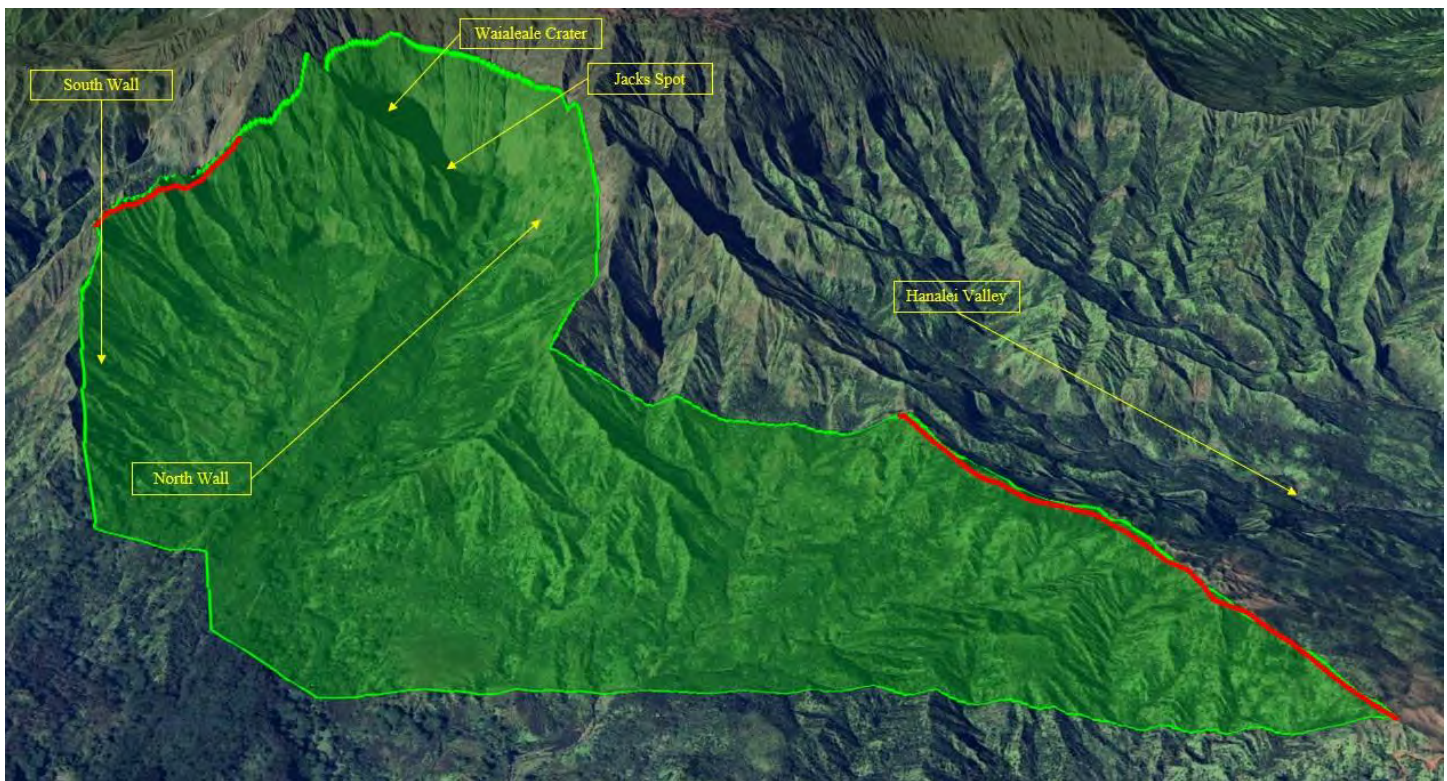
Exit from the Crater at or above 2600ft MSL descending to the South Wall then to 1600ft MSL for TA/S 14 to LIH

Call, "Crater for the South Wall." Then "South Wall for Lihue."

Exit from the Crater at or above 2600ft MSL descending to the South Wall then to 1600ft MSL minimum to enter TA/S 15 climb as necessary to enter TA/S 1 at or above 1500ft MSL.

Exit from the Crater at or above 2600ft MSL descending to the South Wall then to 1600ft MSL minimum to enter TA/S 16 climbing to cross the RR into Hanapepe Valley (KSSA 1) at or above 3400ft MSL.

Remarks: No more than one (1) helicopter inside the crater at a time.



~~Revision Number = Draft~~~~Effective Date = 00/00/00~~**KAUAI KSSA 13 - Makaleha**

Frequency: Kauai tour CTAF 127.05

Enter from TA/S 10 at or above 1600ft MSL then descend for back at or above 1400ft MSL.
Call, "Makaleha"

Exit to TA/S 10 or TA/S 13 at or above 1600ft MSL
Call, "Makaleha for shoreline or the Crater."



Revision Number – Draft

Effective Date – 00/00/00

KAUAI KSSA 14 - Waiahi

Frequency: Kauai tour CTAF 127.05

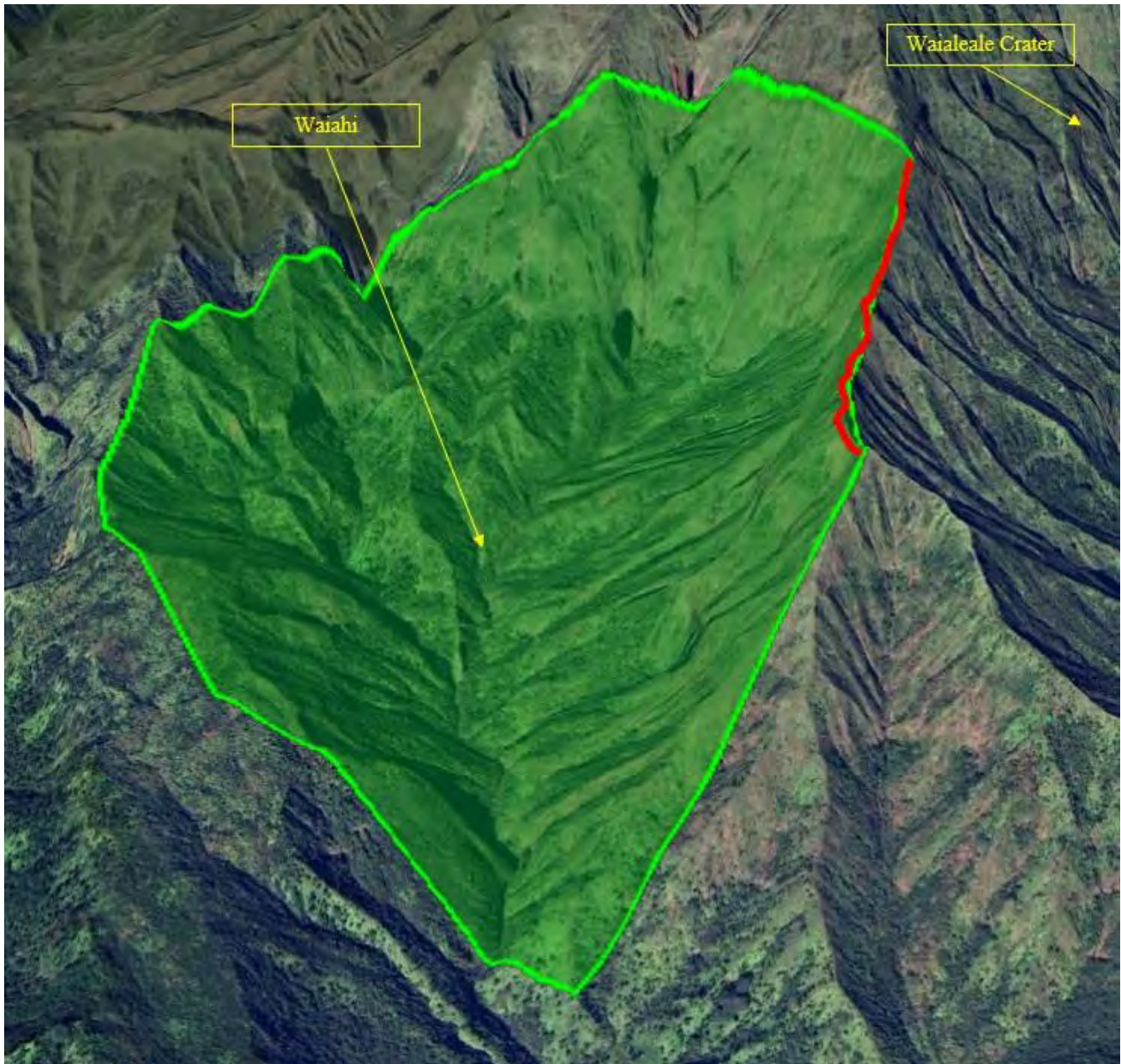
Enter from TA/S 16 at or above 1900ft MSL.

Call, “Entering Waiahi”

Enter from Waialeale Southwall RR at or above 3500ft MSL descending for the front and TA/S 16 at or above 1900ft MSL

Call, “South Wall for Waiahi.”

Exit to TA/S 16 at or above 1900ft MSL.

Call, “Waiahi for state destination.”

CHAPTER 4. PILOT TRAINING

1-General Requirements

- Pilot Evaluations conducted every 12 calendar months with a grace period in accordance with FAR 135.301(a). These evaluations will be in accordance with the company's approved Flight Training Manual and will include KSSA and Transition Area/Segments.
- Flight and Ground instructors will be trained in accordance with the company's approved flight training manual.
- Aircraft Specific training will be conducted in accordance with the company's approved flight training manual. At a minimum it will include:
 - Aircraft-specific performance computation (G),
 - Aircraft systems (G/F),
 - Abnormal and emergency procedures (G/F),
 - Autorotation (F),
 - Hover autorotation (G/F), and
 - IMC recovery procedures (G/F).

2-KSSA Familiarization Flights

- All pilots complete a CATFP and KSSA familiarization flights for each KSSA that they will be authorized to fly. The familiarization flight should include:
 - One complete CATFP familiarization flight to each authorized KSSA shall be done as part of the initial KSSA familiarization process. The familiarization flights shall be completed prior to the initial flight observation.
 - All familiarization flights shall be conducted under the direct supervision of a KSSA-qualified instructor, as designated by the CH or operator, or the Administrator.
 - When a KSSA-qualified instructor is conducting a CATFP familiarization flight, they shall occupy a pilot seat and be designated by the CH or operator as PIC of the flight.
 - Pilots receiving instruction during a KSSA familiarization flight shall be the sole manipulator of the aircraft flight controls, unless the KSSA-qualified instructor needs to intervene to maintain safety of flight.

3-Initial or Annual Flight Observations

- Each pilot shall receive a KSSA flight observation, and the following should be emphasized:
 - All pilots shall have satisfactorily passed a KSSA flight observation since the beginning of the 12th calendar month before that service, within a grace period of one month before and after the due month. This observation shall consist of:
 - Satisfactory completion of a written or oral test that especially emphasizes preflight and cue-based weather evaluation and aeronautical decision making and B048 conditions and limitations to be observed while conducting air tour operations, and
 - Satisfactory completion of a flight observation that includes at least one representative KSSA.
 - KSSA flight observations shall be conducted by the Administrator, or a person approved by the Administrator. Upon satisfactory completion of a KSSA flight observation, all events shall be recorded on a CH- or operator-produced form accepted by the Administrator. The recording of tasks, as per the CH's or operator's FAA-approved training and FAA-accepted operating procedures, shall be completed by the person conducting the flight observation. Recurrent KSSA flight observations conducted in compliance with OpSpec B048 conditions and limitations shall be conducted in the same timeframe as other regulatory checks such as § 135.293. They should also allow for a grace month in accordance with 135.301(a).

4-Instructor Qualifications

- All pilot training and evaluation records (ground and flight) shall be maintained for the period of the pilot's employment, at the principal base of operations as registered on issued OpSpec/LOA A001.
- Operators may use any FAA approved check airman or instructor as a KSSA or Transition Area/Segment Instructor.

5-Documentation and Record Keeping

- Pilot ground and flight training records pertaining to KSSA operations shall reflect part 135 pilot training recordkeeping policies and procedures.
- KSSA training and flight observations should be documented and should include the following information:
 - Ground Training:
 - Name of pilot receiving training,
 - Date of completion,
 - Total training hours received, and
 - Instructor certification.
 - Initial KSSA Familiarization Flight:
 - Name of pilot receiving KSSA familiarization;
 - Date of flight;
 - Flight time (for each familiarization flight);
 - KSSA and Hawaiian island(s) flown;
 - Aircraft registration number;
 - Name, title, and signature of person providing the KSSA familiarization flight; and
 - CH or operator certification.
- KSSA Flight Observation (CH's or Operator's Part 136 Form).
- A statement shall be entered in the remarks section indicating the pilot is authorized to operate below 1,500 feet above the surface, in accordance with the OpSpec/LOA B048 conditions and limitations.
- The pilot recordkeeping system for air tour training and flight observations shall comply with the pilot recordkeeping set forth under § 135.63.
- All pilot and instructor training and evaluation records (ground and flight) shall be maintained by the CH or operator and holder of OpSpec/LOA B048.

6-Training Subjects

- All pilots conducting commercial air tour flights below 1,500 feet above the surface in the State of Hawaii in order to remain in VMC and avoid entering IMC, as authorized through OpSpec/LOA B048 shall be trained on the following subjects:
 - Island-specific unique climatology and terrain influence upon the aeronautical decision making
 - All appropriate types of air tour radio calls
 - knowledge of landmarks commonly used to describe locations of flight hazards
 - Continuous in-flight identification of adequate precautionary and emergency helicopter landing sites
 - Mountain flying techniques and high density altitude;
 - Controlled flight into terrain (CFIT) avoidance;
 - Performance planning;
 - Cue-based, island-specific weather training;
 - Go/no-go procedures;
 - Operations inside the boundaries of a unit of the NPS under an ATMP, a VA, or an IOA;

- Hawaii commercial air tour accident review;
- KSSAs, entry and exit points, traffic circulation patterns and procedures to each KSSA location, radio communications protocol, CTAFs, position reports, and revisions to traffic and CTAF advisory procedures over the past year;
- Operations over water, ditching procedures appropriate to equipment being operated;
- Height velocity diagram and raw terrain descriptions (helicopter only);
- Preflight safety risk analysis and weather factors affecting operations;
- Inclement weather, IMC avoidance, escape, and recovery procedures;
- Familiarization flights;
- Abnormal and emergency procedures;
- Autorotation; and
- Hover autorotation.

Module	Initial Ground Training (2 Hour Minimum)	Initial Flight Training	Recurrent Ground Training (1 Hour Minimum)	Recurrent Flight Training	Initial Flight Observations	Recurrent Flight Observations	Requalification	
							Ground	Flight
Mountain Flying Techniques	X	X	X	X**	X	X	X*	X*
Performance Planning and High Density Altitude Ops	X		X		Oral	Oral	X*	
CFIT Avoidance	X		X		Oral	Oral	X*	
Cue-Based, Island-Specific Weather Evaluation and Aeronautical Decision Making	X		X		Oral	Oral	X*	
Inclement Weather, IMC Avoidance, Escape, and Recovery Procedures	X	X	X	X	X	X	X*	X*
Go/No-Go Procedures	X		X		Oral	Oral	X*	
Familiarization Flights	X	X	X	X	X	X	X*	X*
Preflight Safety Risk Analysis and Weather Factors Affecting Operation	X		X				X*	
Operations Inside the Boundaries of a Unit of the NPS Under an ATMP, a VA, or an IOA	X	X	X	X**	X	X	X*	X*
Hawaii Commercial Air Tour Accident Review	X		X		Oral	Oral	X*	
KSSAs, Entry and Exit Points and Procedures to Each KSSA Location, Radio Communications Protocol, CTAF, and Position Reports	X	At least 1 rep site	X	X**	X At least 1 rep site	X At least 1 rep site	X*	At least 1 rep site*
Operations Over Water, Ditching Procedures Appropriate to Equipment Being Operated	X		X		Oral	Oral	X	

Module	Initial Ground Training (2 Hour Minimum)	Initial Flight Training	Recurrent Ground Training (1 Hour Minimum)	Recurrent Flight Training	Initial Flight Observations	Recurrent Flight Observations	Requalification	
							Ground	Flight
Height Velocity Diagram and Raw Terrain Descriptions (Helicopter Only)	X				Oral	Oral	X*	
Transition to IFR/IMC, if Inclement Weather Avoidance is Unsuccessful	X	X	X	X	X	X	X	X
Abnormal and Emergency Procedures	X	X	X	X	X	X	X	X
Aircraft-Specific Equipment and Related IFR Limitations	X	X	X	X	X	X	X	X
Autorotation		X		X	X	X		X
Hover Autorotation	X	X	X	X	X	X	X	X

** Recurrent flight training for pilots should include, at least flight training in the procedures relative to each KSSA, except that satisfactory completion of a recurrent flight evaluation, evaluating all training elements above, conducted within the previous 12 calendar months, may be substituted for recurrent flight training.

* Items of recurrent training that were not completed when due for requalification or eligibility should be completed within 12 calendar months of the last tour flight.

Exhibit 3



U.S. Department
of Transportation
**Federal Aviation
Administration**

Aviation Safety
Honolulu Combined Safety Assurance Office
Flight Standards District Office

c/o Honolulu Control Facility
760 Worchester Avenue, Room 338
Honolulu, Hawaii 96818
(O) 808-837-8300
(E) 7-AWP-HNL-FSDO@FAA.GOV

February 14, 2025

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Douglas Froning
Director of Operations
Airborne Aviation, Inc.
PO Box 71
Lihue, Hawaii 96766
doug@airborneaviationhawaii.com

Subject: Manual Submission Return for Further Corrections

Dear Mr. Froning:

Upon reviewing your submission of operating manual AC-136-B048 Manual Rev 1, the Honolulu Flight Standards District Office (FSDO) has determined that several sections require further correction to align with the intent of AC 136-4 and B048. Guidance from 8900.1 Volume 3 Chapter 18 Section 4, page 45 thru 57 was used in determining this action. Consequently, we are returning the manual for revision.

The submitted manual contains language concerning KSSA, WSSA, and WESA deviations that must be corrected. Such deviations should only occur in the event of unforecast weather. Please note that altitude deviations to a KSSA for sightseeing purposes are not acceptable.

Additionally, references to Razorback Ridge altitudes (200' AGL) need to be removed from both text and diagrams.

Manual AC-136-B048 Rev 1 should emphasize the use of all installed lights, including landing, navigation and anticollision lights, when operating below 1,500 feet above the surface and should encourage their use when operating above 1,500 feet above the surface at all times in order to enhance the visibility of the aircraft.

The manual should state that the certificate holder is responsible for keeping records of each pilot's participation in the annual formal safety meeting and providing the records to the Administrator upon request.

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acceptable. Altitudes listed on these pages must reflect the MSL altitudes that correspond to a minimum of 1500' above the surface level. We recommend a header above each island-specific page of the manual with verbiage denoting that all 1500' above the surface level is mandatory except in case of unforecast weather.

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- b) Registration number;
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- d) Maintenance and inspection program;
- e) Minimum equipment list (MEL) (as applicable); and
- f) Supplemental Type Certificate (STC) for IFR equipment and ADS-B In and Out and traffic displays and warnings (as applicable).

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 - xvi. Abnormal and emergency procedures.
 - xvii. Autorotation.
 - xviii. Hovering autorotation.
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d. Parts 91, 121, 135, and 136 initial and annual flight observations. Please note that your stated initial KSSA familiarization flight number requirement (one) does not align with AC 136-4, which states that at least **two** complete CATFP familiarization flights to each authorized KSSA should be done as part of the initial KSSA familiarization process.

e. Qualification for ground and flight.

f. Instructor qualifications. Your manual states that “Operators may use any FAA approved check airman or instructor as a KSSA or Transition Area/Segment Instructor.” In accordance with AC 136-4, the operator’s training should specify that the FAA inspector or FAA-authorized air tour operations observation pilot will conduct an initial observation of each CH’s or operator’s air tour operations instructor while the instructor provides training in procedures and maneuvers. The performance of the instructor being observed should be satisfactory before the conditions and limitations are satisfied and the instructor may be accepted as an air tour operations instructor by the FAA.

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- a) Operator-produced ground and flight training forms for line pilots
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- c) Pilot instrument qualifications, currency, initial and recurrent training requirements and record-keeping. Ensure all pilots conducting commercial air tours under this authorization are instrument rated, current, qualified on the specific aircraft flown, and complete and comply with the certificate holder’s FAA-approved pilot training subjects pertaining to all flight operations below 1,500 feet above the surface.

We appreciate your attention to these matters and look forward to receiving the revised manual. Should you have any questions or require further clarification, please do not hesitate to reach out.

Sincerely,

Merritte H. Wilson
Manager (A)
Honolulu Combined Safety Assurance Office – FSDO, AWP-13



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(E) 7-AWP-HNL-FSDO@FAA.GOV

February 14, 2025

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Brent Armenta
Director of Operations
Alexair Inc.
1 Kahului Airport Rd
Hangar 108
Kahului, Hawaii 96732
barmenta@flymaverick.com

Subject: Manual Submission Return for Further Corrections

Dear Mr. Armenta:

Upon reviewing your submission of operating manual AC-136-B048 Manual Rev 1, the Honolulu Flight Standards District Office (FSDO) has determined that several sections require further correction to align with the intent of AC 136-4 and B048. Guidance from 8900.1 Volume 3 Chapter 18 Section 4, page 45 thru 57 was used in determining this action. Consequently, we are returning the manual for revision.

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We appreciate your attention to these matters and look forward to receiving the revised manual. Should you have any questions or require further clarification, please do not hesitate to reach out.

Sincerely,

Merritte H. Wilson
Manager (A)
Honolulu Combined Safety Assurance Office – FSDO, AWP-13



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February 14, 2025

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. William Zeffiro
Responsible Person Business Management
Aloha Helicopter Tours
2798 Upena Street
Lihue, Hawaii 96766
alohahelitours@gmail.com

Subject: Manual Submission Return for Further Corrections

Dear Mr. Zeffiro:

Upon reviewing your submission of operating manual AC-136-B048 Manual Rev 1, the Honolulu Flight Standards District Office (FSDO) has determined that several sections require further correction to align with the intent of AC 136-4 and B048. Guidance from 8900.1 Volume 3 Chapter 18 Section 4, page 45 thru 57 was used in determining this action. Consequently, we are returning the manual for revision.

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Manager (A)
Honolulu Combined Safety Assurance Office – FSDO, AWP-13



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February 14, 2025

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Richard Olsten
Director of Operations
Aris, Inc.
P.O. Box 1539
Makawao, Hawaii 96768
richie@airmaui.com

Subject: Manual Submission Return for Further Corrections

Dear Mr. Olsten:

Upon reviewing your submission of operating manual AC-136-B048 Manual Rev 1, the Honolulu Flight Standards District Office (FSDO) has determined that several sections require further correction to align with the intent of AC 136-4 and B048. Guidance from 8900.1 Volume 3 Chapter 18 Section 4, page 45 thru 57 was used in determining this action. Consequently, we are returning the manual for revision.

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f. Instructor qualifications. Your manual states that “Operators may use any FAA approved check airman or instructor as a KSSA or Transition Area/Segment Instructor.” In accordance with AC 136-4, the operator’s training should specify that the FAA inspector or FAA-authorized air tour operations observation pilot will conduct an initial observation of each CH’s or operator’s air tour operations instructor while the instructor provides training in procedures and maneuvers. The performance of the instructor being observed should be satisfactory before the conditions and limitations are satisfied and the instructor may be accepted as an air tour operations instructor by the FAA.

3. Pilot Training Records and Instrument-Qualifications/Records:

- a) Operator-produced ground and flight training forms for line pilots
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- c) Pilot instrument qualifications, currency, initial and recurrent training requirements and record-keeping. Ensure all pilots conducting commercial air tours under this authorization are instrument rated, current, qualified on the specific aircraft flown, and complete and comply with the certificate holder’s FAA-approved pilot training subjects pertaining to all flight operations below 1,500 feet above the surface.

We appreciate your attention to these matters and look forward to receiving the revised manual. Should you have any questions or require further clarification, please do not hesitate to reach out.

Sincerely,

Merritte H. Wilson
Manager (A)
Honolulu Combined Safety Assurance Office – FSDO, AWP-13



U.S. Department
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**Federal Aviation
Administration**

Aviation Safety
Honolulu Combined Safety Assurance Office
Flight Standards District Office

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760 Worchester Avenue, Room 338
Honolulu, Hawaii 96818
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(E) 7-AWP-HNL-FSDO@FAA.GOV

February 14, 2025

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Richard Olsten
Agent for Service
Aris Nevada, Inc.
3711 Ahukini Road
Lihue, Hawaii 96766
richie@airmaui.com

Subject: Manual Submission Return for Further Corrections

Dear Mr. Olsten:

Upon reviewing your submission of operating manual AC-136-B048 Manual Rev 1, the Honolulu Flight Standards District Office (FSDO) has determined that several sections require further correction to align with the intent of AC 136-4 and B048. Guidance from 8900.1 Volume 3 Chapter 18 Section 4, page 45 thru 57 was used in determining this action. Consequently, we are returning the manual for revision.

The submitted manual contains language concerning KSSA, WSSA, and WESA deviations that must be corrected. Such deviations should only occur in the event of unforecast weather. Please note that altitude deviations to a KSSA for sightseeing purposes are not acceptable.

Additionally, references to Razorback Ridge altitudes (200' AGL) need to be removed from both text and diagrams.

Manual AC-136-B048 Rev 1 should emphasize the use of all installed lights, including landing, navigation and anticollision lights, when operating below 1,500 feet above the surface and should encourage their use when operating above 1,500 feet above the surface at all times in order to enhance the visibility of the aircraft.

The manual should state that the certificate holder is responsible for keeping records of each pilot's participation in the annual formal safety meeting and providing the records to the Administrator upon request.

Pages 11-64 of your submitted manual received minimal review from the FAA, as these pages showed minimum altitudes that did not comply with the intent of AC 136-4.

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**** PLEASE NOTE: The deficiencies related to aircraft and training can be rectified by either updating your current manual accordingly or by providing appropriate pointer references within the current manual to other relevant company manuals or documents. ****

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- e) Minimum equipment list (MEL) (as applicable); and
- f) Supplemental Type Certificate (STC) for IFR equipment and ADS-B In and Out and traffic displays and warnings (as applicable).

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 - xviii. Hovering autorotation.
- b. Courseware. The operator should include and present to the Administrator, at a minimum, the training courseware to support the training listed above.
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Sincerely,

Merritte H. Wilson
Manager (A)
Honolulu Combined Safety Assurance Office – FSDO, AWP-13



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February 14, 2025

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Kalaei Gregory
Director of Operations
Hawaii Pacific Aviation
73-310 U'u Street
Kailua-Kona, Hawaii 96740
kalei@maunaloahelicopters.edu

Subject: Manual Submission Return for Further Corrections

Dear Mr. Gregory:

Upon reviewing your submission of operating manual AC-136-B048 Manual Rev 1, the Honolulu Flight Standards District Office (FSDO) has determined that several sections require further correction to align with the intent of AC 136-4 and B048. Guidance from 8900.1 Volume 3 Chapter 18 Section 4, page 45 thru 57 was used in determining this action. Consequently, we are returning the manual for revision.

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Additionally, references to Razorback Ridge altitudes (200' AGL) need to be removed from both text and diagrams.

Manual AC-136-B048 Rev 1 should emphasize the use of all installed lights, including landing, navigation and anticollision lights, when operating below 1,500 feet above the surface and should encourage their use when operating above 1,500 feet above the surface at all times in order to enhance the visibility of the aircraft.

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Sincerely,

Merritte H. Wilson
Manager (A)
Honolulu Combined Safety Assurance Office – FSDO, AWP-13



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February 14, 2025

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Curt Lofstedt
Chief Executive Officer (CEO)
Island Helicopters Kauai, Inc.
PO Box 831
Lihue, Hawaii 96766
curt@islandhelicopters.com

Subject: Manual Submission Return for Further Corrections

Dear Mr. Lofstedt:

Upon reviewing your submission of operating manual AC-136-B048 Manual Rev 1, the Honolulu Flight Standards District Office (FSDO) has determined that several sections require further correction to align with the intent of AC 136-4 and B048. Guidance from 8900.1 Volume 3 Chapter 18 Section 4, page 45 thru 57 was used in determining this action. Consequently, we are returning the manual for revision.

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February 14, 2025

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Jason Darr
Director of Operations
Jack Harter Helicopters, Inc.
4231 Ahukini Road
Lihue, Hawaii 96766
jdarr@jackhartherheli.com

Subject: Manual Submission Return for Further Corrections

Dear Mr. Darr:

Upon reviewing your submission of operating manual AC-136-B048 Manual Rev 1, the Honolulu Flight Standards District Office (FSDO) has determined that several sections require further correction to align with the intent of AC 136-4 and B048. Guidance from 8900.1 Volume 3 Chapter 18 Section 4, page 45 thru 57 was used in determining this action. Consequently, we are returning the manual for revision.

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3. Pilot Training Records and Instrument-Qualifications/Records:

- a) Operator-produced ground and flight training forms for line pilots
- b) Operator-produced ground and flight training forms for instructor pilots
- c) Pilot instrument qualifications, currency, initial and recurrent training requirements and record-keeping. Ensure all pilots conducting commercial air tours under this authorization are instrument rated, current, qualified on the specific aircraft flown, and complete and comply with the certificate holder’s FAA-approved pilot training subjects pertaining to all flight operations below 1,500 feet above the surface.

We appreciate your attention to these matters and look forward to receiving the revised manual. Should you have any questions or require further clarification, please do not hesitate to reach out.

Sincerely,

Merritte H. Wilson
Manager (A)
Honolulu Combined Safety Assurance Office – FSDO, AWP-13



U.S. Department
of Transportation
**Federal Aviation
Administration**

Aviation Safety
Honolulu Combined Safety Assurance Office
Flight Standards District Office

c/o Honolulu Control Facility
760 Worchester Avenue, Room 338
Honolulu, Hawaii 96818
(O) 808-837-8300
(E) 7-AWP-HNL-FSDO@FAA.GOV

February 14, 2025

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Ms. Nicole Battjes
Director of Operations
Novictor Aviation LLC
155 Kapalulu Place
Suite 197
Honolulu, Hawaii 96819
nicole@rainbowhelicopters.com

Subject: Manual Submission Return for Further Corrections

Dear Ms. Battjes:

Upon reviewing your submission of operating manual AC-136-B048 Manual Rev 1, the Honolulu Flight Standards District Office (FSDO) has determined that several sections require further correction to align with the intent of AC 136-4 and B048. Guidance from 8900.1 Volume 3 Chapter 18 Section 4, page 45 thru 57 was used in determining this action. Consequently, we are returning the manual for revision.

The submitted manual contains language concerning KSSA, WSSA, and WESA deviations that must be corrected. Such deviations should only occur in the event of unforecast weather. Please note that altitude deviations to a KSSA for sightseeing purposes are not acceptable.

Additionally, references to Razorback Ridge altitudes (200' AGL) need to be removed from both text and diagrams.

Manual AC-136-B048 Rev 1 should emphasize the use of all installed lights, including landing, navigation and anticollision lights, when operating below 1,500 feet above the surface and should encourage their use when operating above 1,500 feet above the surface at all times in order to enhance the visibility of the aircraft.

The manual should state that the certificate holder is responsible for keeping records of each pilot's participation in the annual formal safety meeting and providing the records to the Administrator upon request.

Pages 11-64 of your submitted manual received minimal review from the FAA, as these pages showed minimum altitudes that did not comply with the intent of AC 136-4. Depicted “normal” ingress and egress altitudes below 1500' above the surface level are not acceptable. Altitudes listed on these pages must reflect the MSL altitudes that correspond to a minimum of 1500' above the surface level. We recommend a header above each island-specific page of the manual with verbiage denoting that all 1500' above the surface level is mandatory except in case of unforecast weather.

Additionally, the submitted manual contains the missing elements of aircraft and training, as specified in 8900.1 Volume 3 Chapter 18 Section 4, pages 45 through 57, AC 136-4 and Operation Specification B048.

**** PLEASE NOTE: The deficiencies related to aircraft and training can be rectified by either updating your current manual accordingly or by providing appropriate pointer references within the current manual to other relevant company manuals or documents. ****

Updates must address the areas of aircraft and training, described below:

Aircraft:

Within your current manual or other referenced document or manual, please provide a list of aircraft to be utilized for commercial air tour operations which should include the following information for each specific aircraft:

- a) Aircraft make, model, and series (M/M/S);
- b) Registration number;
- c) IFR equipment installed;
- d) Maintenance and inspection program;
- e) Minimum equipment list (MEL) (as applicable); and
- f) Supplemental Type Certificate (STC) for IFR equipment and ADS-B In and Out and traffic displays and warnings (as applicable).

Training:

The manual, as submitted, does not meet the necessary requirements for addressing Pilot Training Subjects nor Pilot Training Records. While certain training items were referenced briefly, the training references within the submitted manual remain incomplete. Within your current manual or other referenced document or manual, items that need to be included are as follows:

- a) Pilot Training Document(s) Contents:
 - 1. General Information if electing to create a separate Training Manual that satisfies the requirements outlined in AC 136-4
 - a. Effective date.
 - b. Purpose of the document.
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- e. Explanation of changes.
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- h. Table of contents.
- i. General section—authorization and associated regulations.
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2. Curriculum and hour requirement for ground and flight training

- a. Initial and recurrent ground and flight training:
 - i. Mountain flying techniques and high-density altitude operations.
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 - vi. Operations inside the boundaries of a unit of the National Park System (NPS), ATMP, IOA, and Voluntary Agreements (VA) (as applicable).
 - vii. Hawaii commercial air tour accident review, including findings/factors that may have led to the accident.
 - viii. KSSA commercial air tour training (each KSSA), and emergency landing procedures.
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 - xv. Preflight safety risk analysis and weather factors affecting the operation.
 - xvi. Abnormal and emergency procedures.
 - xvii. Autorotation.
 - xviii. Hovering autorotation.
- b. Courseware. The operator should include and present to the Administrator, at a minimum, the training courseware to support the training listed above.
- c. Supplemental courseware. The operator should include and present to the Administrator the following supplemental courseware, which is dependent on the geographic area and scope of operation. Supplemental courseware may vary greatly among CHs and operators depending on their specific area of operation, as applicable and could include ATC letter(s) of agreement and

procedures; National Park Service ATMPs; IOA, OpSpec/LOA B057, and OpSpec/LOA B048; and VAs.

d. Parts 91, 121, 135, and 136 initial and annual flight observations. Please note that your stated initial KSSA familiarization flight number requirement (one) does not align with AC 136-4, which states that at least **two** complete CATFP familiarization flights to each authorized KSSA should be done as part of the initial KSSA familiarization process.

e. Requalification for ground and flight.

f. Instructor qualifications. Your manual states that “Operators may use any FAA approved check airman or instructor as a KSSA or Transition Area/Segment Instructor.” In accordance with AC 136-4, the operator’s training should specify that the FAA inspector or FAA-authorized air tour operations observation pilot will conduct an initial observation of each CH’s or operator’s air tour operations instructor while the instructor provides training in procedures and maneuvers. The performance of the instructor being observed should be satisfactory before the conditions and limitations are satisfied and the instructor may be accepted as an air tour operations instructor by the FAA.

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February 14, 2025

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Mr. Jason Murphy
Director of Operations
Safari Aviation, Inc.
PO Box 1941
Lihue, Hawaii 96766
murphy@safarihelicopters.com

Subject: Manual Submission Return for Further Corrections

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